

2021-22 Annual Report

RESOURCE PROTECTION DIVISION

PRETREATMENT PROGRAM





10844 Ellis Avenue
 Fountain Valley, CA 92708
 714.962.2411
 www.ocsan.gov

October 31, 2022

Jayne Joy, Executive Officer
 California Regional Water Quality Control Board
 Santa Ana Region
 3737 Main Street, Suite 500
 Riverside, CA 92501-3339

Subject: Board Order No. R8-2021-0010, NPDES No. CA0110604
 FY 2021/22 Pretreatment Program Annual Report

In accordance with the requirements of NPDES Permit No. CA0110604, attached please find the FY 2021/22 Pretreatment Program Annual Report which provides information on the Orange County Sanitation District's (OC San's) pretreatment program for the period of July 1, 2021 through June 30, 2022.

The attached annual report provides an update on the status of OC San's pretreatment program in achieving its requirements and objectives. Information is also provided on how the program is administered, the resources used to manage the program, the compliance status of industrial users, and the impact of source control efforts on wastewater and biosolids quality.

Some of the program's highlights for this fiscal year are summarized below:

- ▶ The program has continued to effectively reduce heavy metals discharges. Since 1976/77, the total mass of heavy metals entering OC San's system has decreased by 89% while the mass of metals discharged to the marine environment has decreased by 99%. The influent heavy metals to OC San's treatment plant meet our NPDES effluent standards before wastewater treatment has occurred.
- ▶ During FY 2021/22, 1,611 inspections of facilities were conducted, and 3,648 samples were collected for analysis. In addition to warning notices and self-monitoring notices, 307 separate enforcement actions were taken against noncompliant significant industrial users in FY 2021/22, including compliance meetings and inspections, and the issuance of fees, penalties, enforcement orders and administrative complaint settlements. Over \$82,492 in noncompliance fees and penalties were issued.
- ▶ During FY 2021/22, OC San continued its oversight of IRWD's and SAWPA's pretreatment programs, information on IRWD and SAWPA can be found in Chapter 7 and Appendices G and H of this report.

Should you have any questions regarding the information provided in the report or wish to meet with OC San staff to discuss the report in more detail, please contact me at your convenience at (714) 593-7424.

Mark Kawamoto, P.E.
 Environmental Protection Manager, Resource Protection Division

JAD:aps

- c: EPA Region 9, CWA Compliance Officer
 SWRCB, Pretreatment Program Manager
 Submitted electronically to ciwqs.waterboards.ca.gov,
 R9pretreatment@epa.gov, and NPDES_Wastewater@waterboards.ca.gov

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- Seal Beach
- Stanton
- Tustin
- Villa Park
- County of Orange
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District
- Yorba Linda Water District



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Subject: Board Order No. R8-2021-0010, NPDES No. CA0110604
 Pretreatment Program Semi-Annual Report for the Period of January 1 through
 June 30, 2022

As authorized by NPDES Permit No. CA0110604, the Pretreatment Program Semi-Annual Report information for January 1 through June 30, 2022 has been submitted as part of the Orange County Sanitation District's (OC San's) Pretreatment Program Annual Report for the period of July 1, 2021 through June 30, 2022. Enforcement action and compliance status information has been divided into appropriate six-month summaries.

Should you have any questions regarding the information provided in the report or wish to meet with OC San staff to discuss the report in more detail, please contact me at your convenience at (714) 593-7424.

Mark Kawamoto, P.E.
 Environmental Protection Manager, Resource Protection Division

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- Tustin
- Villa Park
- County of Orange
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District
- Yorba Linda Water District

**POTW PRETREATMENT PROGRAM ANNUAL REPORT
CERTIFICATION STATEMENT**

NPDES Permit Holder: Orange County Sanitation District
Report Due Date: October 31, 2022
Period Covered by this Report: July 2021 through June 2022
Period Covered by Previous Report: July 2020 through June 2021*
Name of Wastewater Treatment Plant(s): Reclamation Plant No. 1 and Treatment Plant No. 2
NPDES Permit Number: CA0110604

Person to contact concerning information contained in this report:

- Name: Mark Kawamoto, P.E.
- Title: Environmental Protection Manager, Resource Protection Division
- Mailing Address: 10844 Ellis Avenue
Fountain Valley, CA 92708-7018
- Telephone: (714) 593-7424

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

October 31, 2022
Date


Mark Kawamoto, P.E.
Environmental Protection Manager, Source Control

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Appendix I. QA/QC Analysis Results

Appendix J. Permittees with Pretreatment Equipment

List of Abbreviations

Acronym or abbreviation	Full phrase	Glossary
BMPs	Best Management Practices	
BOD	Biochemical Oxygen Demand	
CAN	Corrective Action Notice	
CCB	chlorine contact basin	
CCTV	closed-circuit television	
CDS	Continuous Deflective Separation	
CEPT	Chemically Enhances Primary Treatment	
CGS	Central Power Generation System	
CIP	Clean in Place	
CIU	Categorical Industrial Users	
CNB	City of Newport Beach	
CWA	Clean Water Act	
CWEA	California Water Environment Association	
DAF	Dissolved Air Flotation	
ECSA	Enforcement Compliance Schedule Agreements	
EMWD	Eastern Municipal Water District	
EPA	Environmental Protection Agency	
EQ	exceptional quality	
ERP	Enforcement Response Plan	
FOG	fats, oils, and grease	
FSEs	Food Service Establishments	
FTE	full time equivalent	
FTU	fixed treatment unit	
FVM	fluvoxamine	
FY	fiscal year	
GAP	Green Acres Project	
GI	grease interceptors	
GIS	geographic information system	
GWRS	Groundwater Replenishment System	
HC	hydrocarbon	
ICP	Inductive Coupled Plasma	
IEUA	Inland Empire Utilities Agency	
IPA	isopropyl alcohol	
IRWD	Irvine Ranch Water District	
IU	Industrial User	
IUS	Industrial User Survey	
IX	Ion Exchange	
JCSD	Jurupa Community Service District	
JPA	Joint Powers Authority	

Acronym or abbreviation	Full phrase	Glossary
LACSD	Los Angeles County Sanitation District	
LAWD	Los Alisos Water District	
LAWRP	Los Alisos Water Reclamation Plant	
LWH	Liquid Waste Haulers	
MAHL	Maximum allowable headworks loading	
MAIL	Maximum allowable industrial loading	
MBR	Membrane Bioreactor	
MER	Mass Emission Rates	
MDL	method detection limits	
MGD	million gallons per day	
ML	minimum level	
MOUs	Memorandums of Understanding	
MPIO	Monitoring/Production Information Order (SAWPA only)	
MS4	Municipal Separate Storm Sewer System	
MWRP	Michelson Water Recycling Plant, IRWD	
NAICS	North American Industry Classification System	
NISC	Non-Industrial Source Control	
NOV	Notice of Violation	
NTU	nephelometric turbidity unit	
NPDES	National Pollutant Discharge Elimination System	
O&M	Operations and Maintenance	
OCA	Order for Corrective Action	
OCFCD	Orange County Flood Control District	
OCHCA	Orange County Health Care Agency	
OCPW	Orange County Public Works	
OCSD/OC San	Orange County Sanitation District	
OCTR	one-time compliance report	
OCWD	Orange County Water District	
ORP	oxidation-reduction potential	
OSHA	Occupational Safety & Health Administration	
PCB	polychlorinated biphenyls	
PERC	perchloroethylene	
POTW	Publicly Owned Treatment Works	
PPCDs	Pretreatment Program Control Documents	
PSES	Pretreatment Standards of Existing Sources	
PSNS	Pretreatment Standards of New Sources	
PTP	Potable Treatment Plant	
PTS	pretreatment systems	
RAS	Return Activated Sludge	
RCSA	Regulatory Compliance Schedule Agreement	
RL	reporting limit	

Acronym or abbreviation	Full phrase	Glossary
RO	reverse osmosis	
RPD	relative percent difference	
SARI	Santa Ana River Interceptor	
SARWQCB	Santa Ana Regional Water Quality Control Board	
SAWPA	Santa Ana Watershed Project Authority	
SBMWD	San Bernardino Municipal Water Department	
SCAP	Southern California Alliance of Publicly Owned Treatment Works	
SCAQMD	South Coast Air Quality Management District	
SCE	Southern California Edison	
SCFCC	Supplemental Capacity Facilities Capacity Charge	
SIUs	Significant Industrial Users	✓
SLCP	Slug Load Control Plan	
SMR	Self-Monitoring Reports	
SNC	Significant Noncompliance	
SOCWA	South Orange County Wastewater Authority	
SPDP	Special Purpose Discharge Permit	✓
SS	suspended solids	
SSMP	Sewer System Management Plan	
SWRCB	State Water Resources Control Board	
SSOs	Sanitary Sewer Overflows	
TELL	Technical evaluation of local limits	✓
TDS	Total Dissolved Solids	
TMDL	Total Maximum Daily Load	
TOMP	Toxic Organic Management Plan	
TRC	Technical Review Criteria	
TRLL	Technical review of local limits	✓
TSS	Total Suspended Solids	
TST	Test of Significant Toxicity	
TTOs	Total Toxic Organics	✓
UV	ultraviolet	
Valley District	San Bernardino Valley Municipal Water District	
WDR	Waste Discharge Requirements	
Western, WMWD	Western Municipal Water District	
WRCWRA SRPS	West Riverside County Regional Wastewater Authority South Regional Pumping Station	
YVWD	Yucaipa Valley Water District	
YVRWFF	Yucaipa Valley Regional Water Filtration Facility	

Glossary of Defined Terms

Term	Definition	Citation
Compatible Pollutant	A combination of biochemical oxygen demand, suspended solids, pH, fecal coliform bacteria, plus other Pollutants that OCSD's treatment facilities are designed to accept and/or remove. Compatible Pollutants are non-compatible when discharged in quantities that have an adverse effect on OCSD's Sewerage System or NPDES permit, or when discharged in qualities or quantities violating any Federal Categorical Pretreatment Standards, Local Limit, or other discharge requirement.	Ordinance, Section 102.A.14
Discharge Certification	Control mechanism that may be issued to those Users that are discharging regulated wastewater but are not otherwise required to obtain a discharge permit.	Ordinance, Section 307.A
Dry Weather Urban Runoff	Surface runoff flow that is generated from any drainage area within OCSD's service area during a period that does not fall within the definition of Wet Weather. It is surface runoff that contains Pollutants that interfere with or prohibit the recreational use and enjoyment of public beaches or cause an environmental risk or health hazard.	Ordinance, Section 102.A.24
Federal Categorical Pretreatment Standards	Any regulation containing Pollutant discharge limits promulgated by the U.S. EPA in accordance with Sections 307(b) and (c) of the Clean Water Act (33 U.S.C. 1317) which apply to a specific category of Industrial Users and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.	Ordinance, Section 102.A.27
Interference	Any discharge which, alone or in conjunction with a discharge or discharges from other sources, either: a) inhibits or disrupts OC San, its treatment processes or operations, or its biosolids processes, use, or disposal; or b) is a cause of a violation of any requirement of OC San's NPDES permit or prevents lawful biosolids or treated effluent use or disposal.	Ordinance, Section 102.A.39
Local Discharge Limits, Local Limits	Specific discharge limits developed pursuant to 40 CFR 403.5(c) and enforced by OCSD upon industrial or commercial facilities to implement the general and specific discharge prohibitions listed in 40 CFR 403.5(a)(1) and (b).	Ordinance, Section 102.A.42
Non-compatible Pollutant	Any pollutant which is not a compatible pollutant as defined herein.	Ordinance, Section 102.A.54
Ordinance	Document entitled "Wastewater Discharge Regulations" containing OC San requirements, conditions, and limits for connecting and discharging to the sewer system, as may be amended and modified.	Ordinance, Section 102.A.57

Term	Definition	Citation
Pass-Through	Discharge through OC San's Sewerage Facilities to Waters of the U.S. which, alone or in conjunction with discharges from other sources, is a cause of a violation of OC San's NPDES permit.	Ordinance, Section 102.A.59
Pretreatment	The reduction of the amount of Pollutants, the elimination of Pollutants, or the alteration of the nature of Pollutant properties in Wastewater to a level authorized by OCSD prior to, or in lieu of, discharge of the Wastewater into OCSD's Sewerage System. The reduction or alteration can be obtained by physical, chemical or biological processes, by process changes, or by other means.	Ordinance, Section 102.A.65
Pretreatment Program	A program administered by a POTW that meets the criteria established in 40 CFR 403.8 and 403.9 and which has been approved by a Regional Administrator or State Director in accordance with 40 CFR 403.11.	Ordinance, Section 102.A.2
Priority Pollutant	Priority Pollutants shall mean the most recently adopted list of toxic Pollutants identified and listed by EPA as having the greatest environmental impact. They are classified as Non-compatible Pollutants and may require Pretreatment prior to discharge to prevent: a) Interference with OC San's operation; or b) biosolids contamination; or c) Pass Through into receiving waters or into the atmosphere.	Ordinance, Section 102.A.68
Sewerage System	Any and all facilities used for collecting, conveying, pumping, treating, and disposing of Wastewater or sludge or biosolids.	Ordinance, Section 102.A.82
Significant Industrial User	Except as provided in 40 CFR 403.3 (v)(2) and (v)(3), shall mean: (i) All Industrial Users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and/or 40 CFR Chapter I, Subchapter N; and (ii) Any other Industrial User that, pursuant to 40 CFR 403.3(v)(1): discharges an average of 25,000 gallons per day or more of process Wastewater to the POTW (excluding sanitary, noncontact cooling and boiler blowdown Wastewater); contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW Treatment plant; or is designated as such by OCSD on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or requirement (in accordance with 40 CFR 403.8(f)(6)).	Ordinance, Section 102.A.83
Special Purpose Discharge Permit	Control mechanism granted to a user to a user by OC San to discharge unpolluted water, storm runoff, or groundwater to OC San's Sewerage Facilities.	Ordinance, Section 305

Term	Definition	Citation
Technical Evaluation of Local Limits	The technical evaluation of local limits is a study which develops enforceable local requirements to address Federal standards as well as State and local regulations including, but not limited to, passthrough and interference. The study takes into account influent loading, wastewater treatment and reclamation, source control, requirements imposed by the NPDES permit, Waste Discharge Requirements (WDR) orders, or agency policy.	Section 2.0 of 2014 Technical Memorandum No. 1 for OC San's then Local Limits Study and information from page 1-3 and 1-15 (Section 1.4.2.1) of the Dec 1987 Local Limit Guidance Manual
Technical Review of Local Limits	The technical review of local limits is a study which reviews changes that impact existing enforceable local requirements to address federal standards as well as state and local regulations including, but not limited to, Pass Through and Interference. The review takes into account impacts of influent loading, wastewater treatment and reclamation, source control, requirements imposed by the NPDES permit, Waste Discharge Requirements (WDR) orders, or agency policy since the last technical evaluation and may predicate a local limits update.	Section 2.0 of 2014 Technical Memorandum No. 1 for OC San's then Local Limits Study and information from page 1-3 and 1-15 (Section 1.4.2.1) of the Dec 1987 Local Limit Guidance Manual
Total Toxic Organics	The summation of all quantifiable values greater than 0.01 milligrams per liter for the organics regulated by the EPA or OCSD for a specific industrial category.	Ordinance, Section 102.A.94
User	Any Person who discharges or causes a discharge of Wastewater directly or indirectly to a public sewer. User shall mean the same as Discharger. User includes Industrial Users as a type of User.	Ordinance, Section 102.A.96
Wastehauler	Any Person carrying on or engaging in vehicular transport of brine, domestic septage (except the SAWPA Sewer Service Area in compliance with the 1996 OCSD/SAWPA Agreement), or Wastewater as part of, or incidental to, any business for the purpose of discharging directly or indirectly said Wastewater into OCSD's Sewerage System.	Ordinance, Section 102.A.98
Zero Discharge Certification	A control mechanism that is issued by OCSD to ensure that specific facilities are not discharging a Pollutant(s) that may otherwise qualify the facility for a discharge permit.	Ordinance, Section 102.A.103

Executive Summary

E.1 Background

Recognizing the need to control the quality and quantity of wastewaters discharged to the sewerage system, in February 1954, OC San's Board of Directors adopted the first ordinance regulating the use of the sewerage system. This ordinance was subsequently revised and amended in February 1958, April 1970, July 1976, July 1983, September 1989, February 1992, July 1998, July 2008, October 2009, July 2016, and most recently in July 2019 (collectively known as OC San's *Wastewater Discharge Regulations*, "Ordinance"). The 1970 revision formally established OC San's Industrial Waste Division to issue permits, set flow and quality limits, and monitor and inspect industrial discharges to the sewerage system. Substances monitored and regulated included: oil and grease of mineral and petroleum origin, organic materials, dissolved solids, suspended solids, phenolic compounds, radioactive wastes, combustible materials, and any other contaminants that had the potential to degrade wastewater treatment processes or cause problems in the sewerage facilities. In July 1976, the ordinance was revised to include heavy metal limits.

In July 1983, the Ordinance was further amended to include enforcement of the EPA's federal categorical pretreatment standards and to modify local discharge limits for cadmium, copper, polychlorinated biphenyls, pesticides, and Total Toxic Organics. OC San's pretreatment program was approved by the EPA in January 1984. In September 1989, the Ordinance was revised to streamline administrative and enforcement procedures, incorporate EPA regulations adopted since 1983, clarify the intent of the program through added definitions and procedures, and include Special Purpose Discharge Permit requirements and conditions. In February 1992, the Ordinance was amended to revise defined terms, initiate noncompliance sampling fees, and include language giving OC San authority to levy administrative penalties according to changes in state law enacted in January 1992. In July 1998, revisions were made primarily for the deletion of Class III permits, which were issued for the collection of user charges for the discharge of domestic waste. In July 2008, revisions were made regarding the application of tax credits for user charges, and to include Dry Weather Urban Runoff Diversion permit requirements and conditions. In October 2009, the Ordinance was revised to provide clarification regarding transfer of permit ownership. In February 2016, the Ordinance was revised to remove the numeric BOD concentration limit, the cyanide amenable and Total Toxic Organic limits; revised chromium and silver limits; and added 1,4-dioxane, molybdenum, and selenium limits. The most recent revision was adopted in May 2019, and became effective in July 2019, establishing additional discharge requirements and prohibitions but with no change to the local discharge limits.

E.2 Introduction

The fiscal year (FY) 2021/22 OC San Annual Report provides the following:

- Information about the industrial pretreatment program as required by OC San's National Pollutant Discharge Elimination System (NPDES) permit issued by the California Regional Water Quality Control Board, Santa Ana Region (SARWQCB), and the Environmental Protection Agency (EPA); and
- Information on how OC San's pretreatment program is administered; industrial permittees' compliance status; dischargers' effect on OC San's influent, effluent, and biosolids; the labor, equipment, and capital resources used for the program during the fiscal year; and other documentation.

E.2.1 Pretreatment Program Summary

Control of Pollutants

Since FY 1976/77, while Orange County's population has grown, the pretreatment program has been successful in reducing the average daily pounds of metals (described below) entering OC San's system by 89% and metals discharged to the marine environment by 99%. Over this time, individual effluent metals including cadmium, chromium, copper, silver, and lead have been reduced by greater than 99%, nickel by

96%, and zinc by 97% from historical levels. Long-term trends of heavy metals in the effluent show a steady decline since FY 1977 (see Figure ES-1).

OC San's pretreatment program has been effective in reducing the toxic priority pollutants discharged to the sewerage system. It has also been effective in protecting the collection, treatment, and disposal facilities from incidents of pass-through or interference, and it has enabled OC San to meet its NPDES ocean discharge limits. The quality of OC San's influent, effluent, and biosolids are evidence of the program's progress.

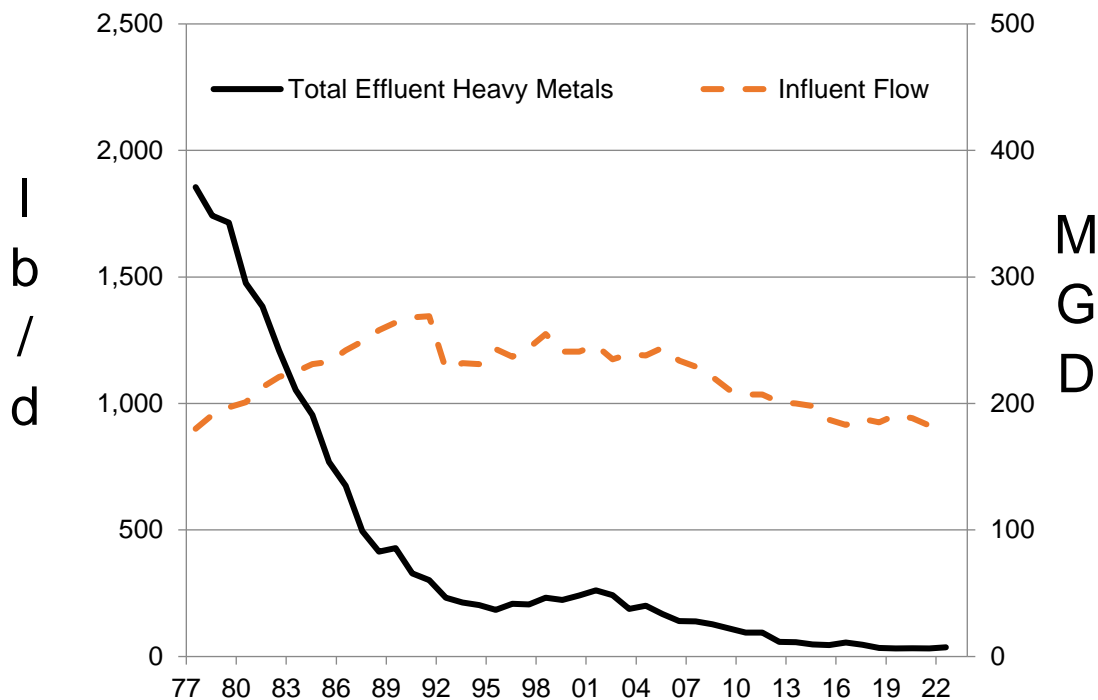


Figure ES-1 Heavy Metals Loading in Effluent (Cd, Cr, Cu, Pb, Ni, Ag, Zn) and Flows for Past Fiscal Years
Orange County Sanitation District, Resource Protection Division

Permits

During FY 2021/22 OC San managed 556 active permits, of which there were 344 Class I permits, 19 Class II permits, 44 Wastehauler permits, 51 Special Purpose Discharge Permits, 21 Dry Weather Urban Runoff Diversion permits, 38 FOG (fats, oils, and grease) permits, and 30 zero-discharge certifications. This level of permit activity represents no significant change compared to the total number of active permits at the end of the previous fiscal year. Of the 338 Class I users, 186 were subject to Federal Categorical Pretreatment Standards.

Program Costs

The pretreatment program is funded by industrial permit fees, noncompliance sampling fees, and collection of user charges. The pretreatment program operating expenditures for the fiscal year, including laboratory analyses, totaled \$5,334,568. A total revenue of \$18,378,136.63 in sewer use charge payments was received and over \$82,492 in noncompliance fees and penalties including Significant Noncompliance (SNC) reporting and publication fees, were issued through the pretreatment program.

Inspection, Sampling, and Enforcement

OC San performed 1,611 industrial inspections during the fiscal year, with the collection of 3,648 samples. 69 compliance inspections and 10 compliance meetings were held with significant industrial users (SIUs) to identify and assess noncompliance problems and propose long-term solutions. OC San conducted three covert downstream monitoring events. 27 SIU permittees of the 344 (7.9%) that were active in FY 2021/22 were determined to be in significant noncompliance and their names were published in the newspaper (Appendix A. Monitoring and Compliance Status Report).

Significant Changes in Operating the Pretreatment Program

There were no significant changes to the OC San Pretreatment Program during FY 2021/22.

E.2.2 Pretreatment Program Elements

OC San administers several different program elements designed to meet the goal of controlling discharges from industrial sources. These have a direct influence on OC San's ability to meet federal, ocean discharge, biosolids reuse and disposal, and water reclamation requirements.

Public Participation

OC San published those industries that were in significant noncompliance in the local newspaper.

Resource Protection Division staff routinely attend outside agency/association meetings, conferences, and workshops, serve on committees, and give presentations. By working with other agencies and professional associations OC San staff are aware of developing regulation, technological innovations, and future trends that may impact that OC San and the community we serve. Please see Chapter 9 for more information.

Wastehauler Program

During FY 2021/22, 44 wastehaulers were under permit with OC San and a total of 152 trucks were used to deliver the loads to OC San. During the past fiscal year, 11.6 million gallons of waste were discharged by permitted wastehaulers at the Plant No. 1 Wastehauler Station.

Total Toxic Organics Waiver Program

Permittees that have not shown detectible levels of total toxic organics (TTOs) based on results of wastewater discharge analytical data for at least one year are eligible to waive the self-monitoring requirement if it is certified that TTOs are not present or used at the facility. For FY 2021/22 OC San granted 115 companies TTO waivers.

Industrial Operations and Maintenance Improvement Program

The ongoing trend in industrial permittee discharge violations show that most cases are due to inadequate operations and maintenance of permittee's pretreatment systems as well as operator error. This was recognized years ago, when the US EPA audit findings of 1998 recommended that OC San develop and implement an industrial operations and improvement program. In 1999/2000, OC San developed a plan that included outreach and operator training, and enforcement of requirements for operator and operations and maintenance practices that is still in effect today.

In 2019, OC San conducted a comprehensive training course for industrial wastewater treatment (pretreatment) operators currently employed by facilities holding a Class I Wastewater Discharge Permit. The course was conducted by an engineering services company (selected via bid process for a five-year contract in 2019). OC San provided this training, free of charge, to assist permittees to obtain and retain a qualified pretreatment operator and to reduce or eliminate noncompliance due to operation and maintenance and/or operator problems. The training course consisted of five 4.5-hour classes and a follow-up wastewater audit at the operator facility to ensure proper implementation of operation and maintenance practices. Those that attended the classes, passed the exam and quizzes, and successfully fulfilled the audit requirements, received certificates of completion. This program is currently on hold during the COVID-19 pandemic.

Non-Industrial Source Control Program

Recognizing a need to address discharges from sources not covered by the traditional industrial Pretreatment Program (e.g., commercial and residential sources) in preparation for the initiation of GWRS, OC San established its Non-Industrial Source Control (NISC) Program in 2004. The purpose of OC San's NISC Program is to promote and implement the application of waste management strategies and practices that reduce or eliminate the generation of wastestreams at their sources, thereby reducing the volume and toxicity of wastestreams entering OC San's sewerage system. More details are available in Chapter 9.

E.2.3 Compliance with NPDES Discharge Requirements

There were no plant upsets, interference, or pass-through incidents attributable to industrial users in FY 2021/22.

Chapter 1. NPDES Requirements – Pretreatment

1.1 Pretreatment Requirements – Compliance with National Pollutant Discharge Elimination System (NPDES) Permit Requirements

This section is a summary of the pretreatment program requirements contained in OC San's NPDES Permit No. CA0110604 Order No. R8-2021-0010 (Permit), effective August 1, 2021, jointly issued by the SARWQCB and US EPA Region IX. The requirements for the industrial pretreatment program are listed in Sections V and VII of the Permit, as well as Attachment E and Attachment H. The requirements are shown below, using the corresponding numeration found in the Permit. Each requirement is followed by a summary of the activity that has resulted in OC San's compliance with Permit requirements, or a reference may be given where additional information can be found in this annual report.

Section V. Performance Goals and Mass Emission Benchmarks, B. Mass Emission Benchmarks – Discharge Point 001

The following 12-month average mass emission benchmarks for Discharge Point 001 (120" outfall) are prescribed below in Table 7. For each parameter with a mass emission benchmark, the Discharge shall report the annual mass emission and the effluent concentrations and flows used to calculate the annual mass emission in the annual pretreatment report and annual receiving water monitoring report (effluent chapter).

These mass emission benchmarks are not enforceable water quality-based effluent limitations. They may be re-evaluated and revised during the five-year permit term. For this Order/Permit, the mass emissions benchmarks (in metric tons per year; MT/yr) were determined based on 2015 through 2019 effluent mass emission and the Discharger's annual average influent flow of 206 MGD projected for 2025 (see section V of the fact sheet in Attachment F).

The mass emission benchmark information is contained in Chapter 2, Table 2.7 of this annual report.

Section VII. Provisions, C. Special Provisions, 6. Special Provisions for Publicly Owned Treatment Works (POTWs), b. Pretreatment

The discharger shall implement and enforce its approved pretreatment program in accordance with federal pretreatment regulations (40 CFR § 403); pretreatment standards promulgated under CWA sections 307(b), 307(c), 307(d), and 402(b); pretreatment requirements specified under 40 CFR §122.44(j); and the requirements specified in Attachment H of this Order/Permit.

OC San has an ongoing commitment to meet the provisions of this requirement, and all pretreatment requirements are enforced as discussed throughout this report. The Ordinance contains specific provisions to meet the provisions of this requirement.

Attachment E – Monitoring and Reporting Program (MRP), IV. Effluent Monitoring Requirements, C. Mass Emission Benchmarks

Constituents that have been assigned Mass Emission Benchmarks are listed in the NPDES Order/Permit under Section V.B. The Mass Emission Benchmarks have been established for the discharge through Discharge Point 001 (120" outfall) and shall be reported in metric tons per year (MT/yr). The discharger shall monitor and report annually the mass emission rate for all constituents that have mass emission benchmarks. For each constituent, the 12-month average mass emission rate, and the effluent concentrations and flows used to calculate that mass emission rate shall be reported in the annual pretreatment report and annual receiving water monitoring report (effluent chapter).

The mass emission benchmark information is contained in Chapter 2, Table 2.7 of this annual report.

Attachment E – Monitoring and Reporting Program (MRP), XII. Reporting Requirements, B. Other Reports, 1. Pretreatment Report

By October 31st of each year, the Discharger shall submit annual pretreatment reports to the Santa Ana Water Board, the State Water Board, and USEPA, describing the Discharger's pretreatment activities over the previous OCSD fiscal year (July 1 through June 30). The annual reports shall contain, but not be limited to, the information required in the attached Pretreatment Reporting Requirements (Appendix H), or an approved revised version thereof. If the Discharger is not in compliance with any conditions or requirements of this Order/Permit, the Discharger shall include the reasons for noncompliance and shall state how and when the Discharger will comply with such conditions and requirements. Prior to the completion of the GWRS Final Expansion Project, the Discharger shall conduct an annual review of local limits under 40 CFR § 403.5(c)(1) and submit the results as part of the annual pretreatment report. Within two (2) years of the completion of the GWRS Final Expansion Project, the Discharger shall provide a written explanation of the need to revise local limits under 40 CFR § 403.5(c)(1).

OC San was in full compliance with all conditions and requirements of the Permit. OC San has an ongoing commitment to meet the provisions of this requirement as provided in this annual report. OC San has conducted its Technical Review of Local Limits as required, and the results are shown in Chapter 6.

Attachment H - Pretreatment

As described in section VII.C.6.b. of this Order/Permit, the Santa Ana Water Board and USEPA incorporates these pretreatment conditions as requirements of this Order/Permit.

I. General Pretreatment Requirements

A. The discharger shall be responsible and liable for the performance of all Control Authority pretreatment requirements contained in 40 CFR § 403, including any subsequent regulatory revisions to Part 403. Where Part 403 or subsequent revision places mandatory actions upon the Discharger as a Control Authority but does not specify a timetable for completion of the actions, the Discharger shall complete the required actions within one (1) year from the issuance date of this permit or the effective date of the Part 403 revisions, whichever comes later. For violations of pretreatment requirements, the Discharger shall be subject to enforcement actions, penalties, fines and other remedies by the USEPA or other appropriate parties, as provided in the Act. USEPA may initiate enforcement action against a nondomestic user for noncompliance with applicable standards and requirements as provided in the Act.

B. Prior to the completion of the GWRS Final Expansion project, the Discharger shall conduct annual Technical Review of local limits under 40 CFR § 403.5(c)(1) and submit the results as part of the annual pretreatment report. Within two (2) years of the completion of the GWRS Final Expansion project, the Discharger shall provide a written technical evaluation of the need to revise local limits under 40 CFR § 403.5(c)(1), as required in 40 CFR §122.33(j)(2)(ii).

See response above.

C. The Discharger shall enforce the requirements promulgated under CWA sections 307(b), 307(c), 307(d), and 402(b) with timely, appropriate and effective enforcement actions. The Discharger shall cause all nondomestic users subject to federal categorical standards to achieve compliance no later than the date specified in those requirements or, in the case of a new nondomestic user, upon commencement of the discharge.

OC San has an ongoing commitment to meet the provisions of this requirement, and all pretreatment requirements are enforced as discussed in Chapter 4 of this report. The Ordinance contains specific provisions for new dischargers that are more stringent than those required by 40 CFR 403.

The ongoing quarterly inspection, sampling, and monitoring program for each Class I permittee (Significant Industrial User, or SIU) ensures compliance with federal, state, and local regulations. The compliance status of all permittees subject to federal categorical standards are shown in the Fiscal Year 2021/22 List of SIUs with Monitoring and Compliance Status, presented in Appendix A of this report.

D. The Discharger shall perform the pretreatment functions as required in 40 CFR § 403 including, but not limited to:

1. Implement the necessary legal authorities as provided in 40 CFR § 403.8(f)(1);

The legal authorities are contained in OC San's 1983 Ordinance which were approved by EPA in January 1984 and affirmed during the May 1986 audit. Revised ordinances were adopted and became effective September 8, 1989, February 7, 1992, July 1, 1998, July 1, 2008, October 1, 2009, July 1, 2016, and most recently on July 1, 2019.

2. Enforce the pretreatment requirements under 40 CFR § 403.5 and 403.6;

The requirements to enforce and implement National Pretreatment Standards for general prohibitions and specific industrial subcategories are contained in OC San's Ordinance. Chapter 4 of this report describes OC San's enforcement efforts for FY 2021/22.

3. Implement the programmatic functions as provided in 40 CFR § 403.8(f)(2); and

The required functions include the identification, quantification, permitting, and enforcement of the standards set forth in OC San's Ordinance. Chapter 3 and Chapter 4 of this report describe the permitting and enforcement efforts for FY 2021/22.

4. Provide the requisite funding and personnel to implement the pretreatment program as provided in 40 CFR § 403.8(f)(3).

The pretreatment program is funded by industrial permit fees, noncompliance sampling fees, and sewer use charges. The pretreatment program's operating expenditures for FY 2021/22, including laboratory analyses, totaled \$5,334,568. Chapter 5 of this report provides additional details.

E. The Discharger shall submit annually a report to USEPA and the Santa Ana Water Board describing its pretreatment activities over the previous year. In the event the Discharger is not in compliance with any conditions or requirements of this Order/Permit, then the Discharger shall also include the reasons for noncompliance and state how and when the Discharger shall comply with such conditions and requirements. This annual report shall cover operations from July 1 through June 30 and is due on October 31st of each year. The report shall contain, but not be limited to, the following information:

1. A summary of analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW's influent and effluent for those pollutants USEPA has identified under CWA section 307(a) which are known or suspected to be discharged by nondomestic users. This will consist of an annual full priority pollutant scan, with quarterly samples analyzed only for those pollutants detected in the full scan. The Discharger is not required to sample and analyze for asbestos. Sludge sampling and analysis are covered in the sludge section of this Order/Permit. The Discharger shall also provide any influent or effluent monitoring data for nonpriority pollutants which the Discharger believes may be causing or contributing to interference or pass-through. Sampling and analysis shall be performed with the techniques prescribed in 40 CFR § 136.

The influent, effluent, and biosolids sampling information is provided in Chapter 2, Chapter 8, and Appendix B of this annual report.

2. A discussion of Upset, Interference, or Pass Through incidents, if any, at the treatment plant which the Discharger knows or suspects were caused by nondomestic users of the POTW system. The discussion shall include the reasons why the incidents occurred, the corrective actions taken and, if known, the name and address of the nondomestic user(s)

responsible. The discussion shall also include a review of the applicable pollutant limitations to determine whether any additional limitations, or changes to existing requirements, may be necessary to prevent pass through or interference.

There were no plant upsets, interference, or pass-through incidents attributable to industrial users in FY 2021/22.

3. An updated list of the Discharger's significant industrial users (SIUs) including their names and addresses, and a list of deletions, additions and SIU name changes keyed to the previously submitted list. The Discharger shall provide a brief explanation for each change. The list shall identify the SIUs subject to federal categorical standards by specifying which set(s) of standards are applicable to each SIU. The list shall also indicate which SIUs are subject to local limitations.

Appendix A of this report, the Monitoring and Compliance Status Report, provides an updated list of SIUs and identifies the local or set of categorical standards applicable to each SIU.

4. The Discharger shall characterize the compliance status of each SIU by providing a list or table which includes the following information: Name of the SIU, category, if subject to federal categorical standards; type of wastewater treatment or control processes in place; number of samples taken by the POTW during the year; number of samples taken by the SIU during the year; for an SIU subject to discharge requirements for total toxic organics, whether all required certifications were provided; a list of the standards violated during the year, where categorical standards and/or local limits violations are identified; whether the facility is in significant noncompliance (SNC) as defined at 40 CFR § 403.8(f)(2)(viii) at any time during the year; and summary of enforcement or other actions taken during the year to return the SIU to compliance, where the type of action, final compliance date, and the amount of fines and penalties collected, if any, are described, including any proposed actions for bringing the SIU into compliance.

This annual report contains all items listed above. SIU names, categories, number of samples and inspections, violations, and SNC status are shown in Appendix A. SIU wastewater treatment is shown in Appendix J, Total Toxic Organic waivers are shown in Chapter 6, and enforcement actions are shown in Chapter 4 and Appendix D.

5. A brief description of any programs the POTW implements to reduce pollutants from nondomestic users that are not classified as SIUs.

The activities for OC San's pollution prevention programs and non-industrial source control are discussed in Chapter 6 and Chapter 9.

6. A brief description of any significant changes in operating the pretreatment program which differ from the previous year including, but not limited to, changes concerning the program's administrative structure, local limits, monitoring program or monitoring frequencies, legal authority, enforcement policy, funding levels, or staffing levels;

There were no significant changes to the pretreatment program as shown in Chapter 6.

7. A summary of the annual mass emission, and the effluent concentrations and flows used to calculate the annual mass emission (see section V.B. of the Order/Permit);

A summary of the annual mass emission, and effluent concentrations and flows used to calculate annual mass emission can be found in Chapter 2 of this annual report.

8. A summary of the annual pretreatment budget, including the cost of pretreatment program functions and equipment purchases;

For FY 2021/22, the operating expenses for the pretreatment program totaled \$5,334,568. Additional information on pretreatment program costs and purchases are shown in Chapter 5 of this report.

9. A summary of activities to involve and inform the public of the program including a copy of the newspaper notice, if any, required under 40 CFR § 403.8(f)(2)(viii); and

A copy of the significant noncompliance (SNC) notice for the newspaper publication can be found in Appendix E.

10. Results from annual Technical Review of local limits which is conducted under 40 CFR § 403.5(c)(1). See Section I.B of Attachment H.

The results from annual Technical Review of Local Limits can be found in Chapter 6 of this annual report.

Chapter 2. OC San Facilities and Compliance with Discharge Requirements

2.1 Introduction

OC San is responsible for collecting, transporting, and treating wastewater, as well as reusing or disposing of treated wastewater and the separated solids in accordance with all applicable federal, state, and local laws and regulations. The following pages represent a summary of the operation of the wastewater treatment and collection facilities, historical data, and the regulatory compliance record for the period of July 1, 2021 through June 30, 2022 (FY 2021/22). OC San is also enrolled in the statewide Waste Discharge Requirements program for sanitary sewers.

OC San operates and maintains Reclamation Plant No. 1 and Treatment Plant No. 2, 389 miles of sewers, and 15 outlying pump stations. The treatment plants and pump stations are supervised, operated, and maintained by highly trained professionals with appropriate certifications from the California State Water Resources Control Board for treatment plant operators, and voluntary certifications from the California Water Environment Association.

The treated wastewater is either discharged into the Pacific Ocean in strict and consistent compliance with state and federal requirements as set forth in the Permit, or directed to the Orange County Water District (OCWD) for reclamation. Approximately 115 million gallons per day (MGD) of treated wastewater was routed to facilities operated by OCWD during FY 2021/22. The Groundwater Replenishment System (GWRS) produces purified recycled water used to recharge the Orange County Groundwater Basin and protect it from degradation due to seawater intrusion. Phase II of GWRS continues to produce 100 MGD of reclaimed water.

During FY 2021/22, OC San beneficially recycled 99% of the dewatered biosolids for use as agricultural soil amendments and compost products. Total biosolids production for this fiscal year was approximately 198,349 wet tons, a 0.4% reduction from 199,222 wet tons in 2020/21. Solids content was 24.8% for Plant No. 1 and 27.6% for Plant No. 2. Two management options (land application and composting) were utilized through five vendor contracts in two states and four counties. OC San's Biosolids Management Compliance Report for calendar year 2021 describes the solids and management program in more detail (www.ocsan.gov/503). Grit and screenings are transported under contract for landfill disposal. Debris and grit removed from the sewer during cleaning is dried at Plant No. 1 and then hauled to landfill for disposal.

OC San's primary and secondary treatment, digestion, and dewatering facilities were all operated within their respective design capacities for the entire fiscal year.

2.2 Existing OC San Facilities

OC San's operations start with the collection of wastewater from the residential, commercial, and industrial customers in 20 cities, four special districts, and portions of unincorporated Orange County. The average daily flow tributary to OC San per year since 1997 is shown in Table 2.1.

Table 2.1 Average Daily Influent and Effluent Flow in Million Gallons per Day (MGD) Fiscal Year 1996/97-2021/22 Orange County Sanitation District, Resource Protection Division					
FY	Influent (MGD)	Effluent (MGD)	FY	Influent (MGD)	Effluent (MGD)
1997	244	242	2010	207	152
1998	255 ^c	255	2011	207	152
1999	241	239	2012	201	139
2000	241	236	2013	200	137
2001	246	244	2014	198	137
2002	235	231	2015	187	117
2003	239	235	2016	183	92
2004	238	238	2017	188	101
2005	244	247 ^b	2018	185	88
2006	234	235	2019	191	104
2007	229	232 ^b	2020	188	101
2008	221 ^a	212 ^d	2021	182	91
2009	211 ^a	167	2022	179	94

a. Decreases due to drought; less infiltration due to drier soils and business recession.
b. There was more effluent than influent due to in-plant construction and dewatering that was discharged downstream of influent metering.
c. El Niño (wet year).
d. Beginning in 2008, more influent than effluent due to Groundwater Replenishment System.

2.2.1 Description of Treatment Plants

Based on population served, OC San is one of the largest wastewater facilities in the United States. The network of interceptor sewers, treatment units and disposal systems are quite complex. The following sections provide an overview of the treatment facilities.

2.2.1.1 Reclamation Plant No. 1

Reclamation Plant No. 1 is located in the City of Fountain Valley adjacent to the Santa Ana River. The metering and diversion structure, constructed in 1974, allows the excess wastewater from any of the six trunk sewers tributary to Plant No. 1 to be diverted to Plant No. 2 to avoid overloading Plant No. 1 and to provide for maintenance and construction activities. The metering and diversion structure also contains pH, conductivity, and flow meters to monitor the incoming wastewater on each trunk sewer. The operational flexibility also allows Plant No. 1 to provide the highest quality of wastewater for reclamation at OCWD. Flows from the Santa Ana River Interceptor trunkline, which contains Santa Ana Watershed Project Authority (SAWPA) discharges, are diverted to Plant No. 2.

The wastewater flows through bar screens with 5/8-inch-wide openings where large solids (e.g., rags, non-dispersible materials, plastics, grease chunks) are removed. Wastewater is then pumped to aerated grit chambers where the velocity of the water is slowed to allow coffee grounds, seeds, sand, gravel, and other heavy particulate debris to settle out. All the screenings and grit are hauled by a contractor to a landfill for disposal. Foul air at the treatment plants is captured from the trunk sewers at the metering and diversion structure, headworks structures, and grit chambers for treatment in the odor control chemical scrubbers. Five main sewage pumps (four on-duty and one standby) lift flow to the grit chambers.

For improved performance, OC San conducts chemically enhanced primary treatment (CEPT). Ferric chloride and anionic polymer are added to the primary clarifiers to enhance settling of the organic solids. Each primary clarifier is covered to capture foul air for treatment in scrubbers. Plant No. 1 has a primary treatment capacity of 204 MGD.

During FY 2021/22, 100% of the Plant No. 1 primary effluent received secondary (biological) treatment either in a conventional air activated sludge secondary treatment process or in trickling filters. An average of 115 MGD of the secondary treated water was pumped to OCWD's GWRS and the Green Acres Project (GAP) for advanced tertiary treatment. Advanced tertiary treatment prepares the water for injection into the groundwater as a barrier against saltwater intrusion, and for percolation to the aquifer for water reclamation and reuse. OCWD also provides GAP water for industrial uses to OC San. The balance of the Plant No. 1 secondary effluent flows by gravity to Plant No. 2 where it is blended with treated wastewater from Plant No. 2 prior to pumping and ocean discharge.

Solids collected in the primary and secondary clarifiers are pumped to anaerobic digesters for organic waste stabilization and pathogen destruction at 98 degrees Fahrenheit (°F). Following digestion, the sludge is dewatered using a centrifuge process. The centrifuge-dewatered biosolids are removed by private contractors. Stabilization results in the production of digester gas, a fuel which is approximately 63% methane and 36% carbon dioxide. This fuel has a heating value of about 619 British thermal units per cubic foot (BTU/cu. ft.). The primary and secondary sludge is blended and thickened in the thickening centrifuge units prior to digestion. Digester gas is collected, compressed, cleaned, and distributed to the Central Power Generation System (CGS) at each plant as a renewable fuel for energy generation.

In a typical year at Plant No. 1, natural gas and digester gas fuel three internal combustion engines that power 2,500 kilowatt (kW) electric generators. From October through May only two of the three engine generators operate at one time to meet air quality permit limits. During summer months (June – September), the plant's power balance is supported by 2 engines operating during peak hours and battery back-up. Three engines online can only be run during certain contractual agreement. Supplemental power was purchased from Southern California Edison (SCE) to provide for the remainder of the Plant No. 1 energy demand. The internal combustion engines were fueled primarily with digester gas with a small amount (approximately 5-10%) of purchased natural gas added to aid combustion.

2.2.1.2 Treatment Plant No. 2

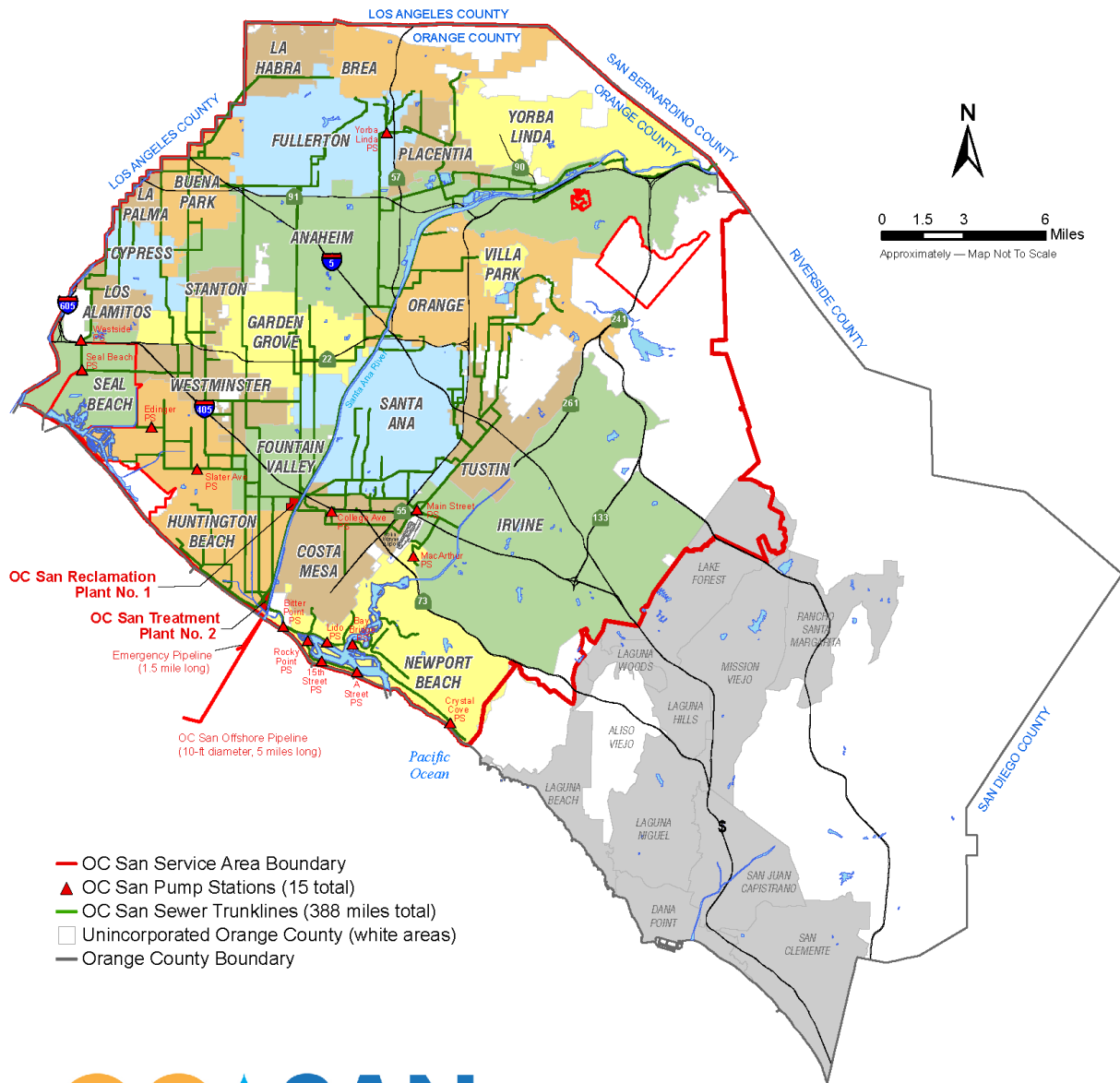
Treatment Plant No. 2 is located in the City of Huntington Beach near the mouth of the Santa Ana River. Five trunk sewers transport wastewater into Headworks D facility, which contains pH, conductivity, and flow meters, along with six mechanically-cleaned bar screens, seven main sewage pumps, and six grit tanks. All screenings and grit are hauled by a private contractor to a landfill for disposal. The foul air from the headworks, grit tanks, and primary sedimentation basins is collected for treatment in a combination of chemical scrubbers and bio-towers.

Ferric chloride and anionic polymer are used to enhance the settling of solids during primary treatment. Settleable and suspended solids, and floatable particulates are removed from the wastewater in primary sedimentation basins and pumped to anaerobic digesters for stabilization. Plant No. 2 primary effluent receives 100% secondary treatment in either an oxygen activated sludge process or trickling filters.

Sludge from the primary and secondary settling basins is treated in anaerobic digesters. Secondary sludge is thickened in Dissolved Air Flotation (DAF) units prior to digestion. Following digestion, the sludge is dewatered using a dewatering centrifuge process. The centrifuge-dewatered biosolids are removed by private contractors.

The Plant No. 2 Central Power Generation System has five internal combustion engines that power five 3,000 kW electric generators and a 1,000-kW steam turbine powered by engine exhaust waste heat. During summer months (June – September), three engines operate during peak hours on weekdays and 2 engines are operate during weekends and on holidays. At all other times, 2 engines are running unless 3 are required to consume excess digester gas. During periods of lower demand, excess power is sold to SCE, and imported during periods of high demand. The internal combustion engines are fueled primarily with digester gas with a small amount (approximately 5-10%) of natural gas.

Orange County Sanitation District Service Area and Treatment Plant Locations in Orange County, California



SOURCE: OC San GIS Data, Rand McNally - Thomas Brothers
REVISED: August 2020

Figure 2-1 Map of Orange County Sanitation District's Service Area
Orange County Sanitation District, Resource Protection Division

2.2.1.3 Joint Works Facilities

Facilities common to both plants are designated as Joint Works Facilities. These include the bypass sewer to divert wastewater from Plant No. 1 to Plant No. 2, effluent lines to convey treated wastewater from Plant No. 1 to Plant No. 2 for ocean discharge, a fiber optic cable line for interplant communication, digester gas transmission and storage line, two outfall pumping stations, two ocean outfalls (designated in the NPDES permit as Discharge Points 001 and 002), and the emergency gravity overflow flap gate valves into the Santa Ana River (Discharge Point 003).

Treated secondary effluent from Plants Nos. 1 and 2 is pumped to OC San's main discharge point, the 120-inch diameter, 5-mile long ocean outfall (the last mile of which is a diffuser with 503 ports that provides a minimum dilution of 181:1). During FY 2021/22 all influent received secondary treatment.

2.3 Compliance with National Pollutant Discharge Elimination System (NPDES) Requirements

This section provides a summary of limitations in OC San's NPDES permit (Order No. R8-2021-0010, NPDES Permit No. CA0110604, effective on August 1, 2021). Table 2.2 shows NPDES Permit discharge requirements and OC San's annual average influent and final effluent discharge values for this reporting period.

Table 2.2 NPDES Permit Discharge Requirements and OC San's Annual Average Influent and Final Effluent Discharge Values for Fiscal Year 2021/22
Orange County Sanitation District, Resource Protection Division

Constituent	OC San's Combined Influent Annual Average	NPDES Permit Discharge Requirement			Final Effluent Annual Average ^A	OC San's Compliance with NPDES Permit Limits
		30-Day Average	7-Day Average	Instantaneous Maximum		
Flow (MGD)	179	--	--	--	94	NA
BOD-C (mg/L)	205	25	40	--	7.1	Yes
BOD-C (lb/d)	--	42,951	68,722	--	5566	Yes
BOD-C (percent removal)	--	>85 ^B	--	--	96.6	Yes
Suspended solids (mg/L)	332	30	45	--	7.5	Yes
Suspended solids (lb/d)	--	51,541	77,312	--	5879	Yes
TSS (percent removal)	--	>85 ^B	--	--	99	Yes
Grease and oil (mg/L)	36.9	25	40	75	0.2	Yes
Grease and oil (lb/d)	--	42,951	68,722	128,853	183	Yes
Settleable solids (mL/L)	--	1.0	1.5	3.0	ND	Yes
Toxicity (acute)	--	--	--	Pass/Fail	Pass	Yes
Toxicity (chronic)	--	--	--	Pass/Fail	Pass	Yes
Turbidity (NTU)	--	75	100	225	3.0	Yes
pH	7.4 (P1), 8.0 (P2)	6.0 to 9.0	6.0 to 9.0	9.0	8.1	Yes
Total Chlorine Residual (mg/L)	--	0.36 ^C	--	10.86; D _{max} = 1.45	0.09 ^C	Yes
Total Chlorine Residual (lb/d)	--	618 ^C	--	18,658; D _{max} = 2,491	62 ^C	Yes
Benzidine (µg/L)	ND	0.0125	--	--	ND	Yes
Benzidine (lb/d)	--	0.0215	--	--	--	Yes
Hexachlorobenzene (µg/L)	ND	0.0380	--	--	ND	Yes
Hexachlorobenzene (lb/d)	--	0.0653	--	--	--	Yes
PCBs (µg/L)	ND	0.0034	--	--	ND	Yes
PCBs (lb/d)	--	0.0058	--	--	--	Yes
TCDD equivalents (pg/L)	NR	0.7059	--	--	ND	Yes
TCDD equivalents (lb/d) ^D	--	0.0000012	--	--	--	Yes
Toxaphene (µg/L)	NR	0.0380	--	--	ND	Yes
Toxaphene (lb/d)	--	0.0653	--	--	--	Yes

Note that the Permit became effective in August 2021, final effluent was compliant with 2012 and 2021 effluent limitations. Additional influent/effluent data is shown in Appendix B

-- Not determined

^A Based on the average of the values reported in the monthly Discharge Monitoring Report. For values based on 30-day rolling maximum averages, refer to the Benchmark section of the Source Control and Ocean Monitoring Annual Reports.

^B Monthly average minimum

^C 6-month median

^D lb/d = pounds per day

ND Not detected

NR Not required. The NPDES permit requires monitoring and analysis of TCDD equivalents in effluent only.

NA Not applicable

2.4 Effluent Characteristics

2.4.1 General

The OC San NPDES permit establishes water quality effluent constituent compliance limits for relevant wastewater parameters and toxic materials. The following sections represent a review of the current and historical compliance status for the relevant wastewater parameters. OC San's annual average daily influent and final effluent for suspended solids and carbonaceous BOD (BOD-C) for the past five fiscal years are shown in Table 2.3.

2.4.2 Suspended Solids

During FY 2021/22, the suspended solids discharge was in compliance with Permit effluent limits. The final effluent monthly average suspended solids concentration of 7.5 milligrams per liter (mg/L) for a monthly average discharge mass emissions rate of 5,879 pounds per day (lb/d) during FY 2021/22 is 19% of the allowable 30-day average concentration limit of 30 mg/L, and 8.9% of the mass emissions limit of 51,541 lb/d. A summary of the suspended solids data for the past five years is shown in Table 2.3.

2.4.3 Carbonaceous Biochemical Oxygen Demand (BOD-C)

The current 30-day average discharge permit limit for carbonaceous BOD is 25 mg/L. The discharge was in compliance for FY 2021/22. The final effluent 30-day average for FY 2021/22 was 9.3 mg/L with a removal rate of 97%. A summary of the carbonaceous BOD data for the past five years is shown in Table 2.3.

Table 2.3 Suspended Solids and BOD-C Annual Average Daily Influent and Final Effluent for Fiscal Years 2017/18 – 2021/22 Orange County Sanitation District, Resource Protection Division								
FY	Suspended Solids				BOD-C			
	Influent		Effluent		Influent		Effluent	
	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d	mg/L	lb/d
2017/18	396	611,000	5.0	3,700	220	339,400	4.4	3,200
2018/19	382	611,700	5.7	4,990	214	342,700	4.8	4,200
2019/20	327	512,700	5.3	4,583	209	327,700	5.4	4,435
2020/21	315	478,130	5.4	4,116	211	320,270	6.4	4,858
2021/22	332	503,930	5.8	4,566	205	311,160	9.3	6,778

2.4.4 Oil and Grease

The 30-day effluent limit for oil and grease is 25 mg/L and 42,951 lb/d. Average oil and grease was measured at 1 mg/L in the treated effluent during this fiscal year.

2.4.5 Settleable Solids

The 30-day average limit for settleable solids is 1.0 milliliter per liter (mL/L) with a maximum at any time of 3.0 mL/L. The FY 2021/22 average for settleable solids was non-detectable. A summary of the annual average settleable solids data for the past five years is shown in Table 2.4.

2.4.6 Turbidity

Turbidity is a measurement of the microscopic suspended solids or finely divided silty particles in water discharged to the ocean. The compliance limit for turbidity is 75 nephelometric turbidity units (NTU) based on a 30-day average. The FY 2021/22 average turbidity was 2.6 NTU. A summary of the turbidity data for the past five years is shown in Table 2.4.

2.4.7 pH

Pursuant to the Permit, the pH of the ocean discharge shall neither exceed 9.0 nor be less than 6.0. The final effluent was in compliance throughout FY 2021/22. The annual average pH was 7.5, which is well within the high and low pH effluent limits. The ocean discharge pH has remained relatively constant over the past five years, as summarized in Table 2.4.

Table 2.4 Settleable Solids, Turbidity, and pH, Average Final Effluent for Fiscal Year 2017/18-2021/22 Orange County Sanitation District, Resource Protection Division			
FY	Settleable Solids (mL/L)	Turbidity (NTU)	pH
2017/18	ND	3.4	8.0
2018/19	ND	2.5	8.0
2019/20	ND	2.4	8.1
2020/21	ND	3.0	8.1
2021/22	ND	2.6	7.5

2.4.8 Toxicity

OC San's NPDES permit requires that the final effluent be tested once per month for chronic toxicity, and quarterly for acute toxicity. Results of acute and chronic tests are reported as either a "Pass" or "Fail" following the Test of Significant Toxicity (TST) hypothesis testing approach described in the National Pollutant Discharge Elimination System Test of Significant Toxicity Implementation Document (USEPA 833-R-10-003, 2010).

Every calendar year the effluent must be tested using each of the species listed in the NPDES permit to determine which species are most sensitive to the effluent. The most sensitive test species are then used as the test organisms for monthly and quarterly testing. In November 2021, acute toxicity tests were performed with Topsmelt (*Atherinops affinis*) and the mysid crustacean (*Americamysis bahia*) to determine the most sensitive acute test species. There were no observed effects for both species. All FY 2021/22 quarterly tests continued to be performed with *Atherinops affinis* as the most sensitive test species.

In November 2021, chronic toxicity tests were performed with giant kelp (*Macrocystis pyrifera*), purple sea urchin (*Strongylocentrotus purpuratus*), and Topsmelt (*Atherinops affinis*) to determine the most sensitive chronic test species. There were no observed adverse effects for all three species. All FY 2021/22 monthly chronic tests continued to be performed with *Strongylocentrotus purpuratus* as the most sensitive test species.

Table 2.5 summarizes the toxicity testing results for FY 2017/18 through FY 2021/22. All FY 2021/22 acute (n=4 tests) and chronic (n=12) toxicity tests passed the TST, indicating no observable final effluent toxicity.

Table 2.5 Final Effluent Yearly Toxicity Results for Fiscal Years 2017/18-2021/22 Orange County Sanitation District, Resource Protection Division		
FY	Test Species	Summary of Toxicity Results
2017/18	Acute (<i>A. affinis</i>)	Pass
	Chronic (<i>S. purpuratus</i>)	Pass
2018/19	Acute (<i>A. affinis</i>)	Pass
	Chronic (<i>S. purpuratus</i>)	Pass
2019/20	Acute (<i>A. affinis</i>)	Pass
	Chronic (<i>S. purpuratus</i>)	Pass
2020/21	Acute (<i>A. affinis</i>)	Pass
	Chronic (<i>S. purpuratus</i>)	Pass
2021/22	Acute (<i>A. affinis</i>)	Pass
	Chronic (<i>S. purpuratus</i>)	Pass

2.5 Facilities Special Projects

2.5.1 Plant No. 1 Headworks Rehabilitation

Construction for Project No. P1-105 will rehabilitate and upgrade Plant No. 1 Headworks. New structures to be constructed as part of this project include Grit Pump Station, Grit Handling Building, Headworks Odor Control Facility, Electrical Buildings, and other support systems.

2.5.2 Plant No. 2 Headworks Modifications for GWRS Final Expansion

Construction Project No. P2-122 will modify headworks and sidestream routing to create separate treatment trains for reclaimable and non-reclaimable flows to support the GWRS Final Expansion. This project will also replace three out of seven Main Sewage Pumps (MSPs) with more efficient lower capacity pumps. Upon project completion the Trickling Filter Solids Contact/Sludge Reaeration (SC/SR) process will treat the reclaimable stream and the Activated Sludge (AS) process will treat the non-reclaimable stream. This project will provide OCWD with additional flow and increase OC San's flexibility to route flows between Plant No. 1 and Plant No. 2.

2.5.3 Plant No. 2 Return Activated Sludge Piping Replacement

Return Activated Sludge (RAS) piping will be replaced at the Plant No. 2 Oxygen Activated Sludge Plant from the secondary clarifiers to the RAS pumps under Project No. P2-123. Area lights will also be replaced, and concrete cracks and the spalling on the east aeration basin decks will also be fixed.

2.5.4 Plant No. 2 Outfall Low Flow Pump Station

The Trickling Filter Solids Contact/Sludge Reaeration (SC/SR) process will treat the additional reclaimable flows to be sent to OCWD to support the GWRS Final Expansion. Once completed, the Outfall Low Flow Pump Station under Project No. J-117B will convey the reduced daily flows to the ocean outfall. The Ocean Outfall Booster Station (OOBS) will be rehabilitated to adapt to change in daily flow. A new Plant Water Pump Station (PWPS) will also be constructed to draw secondary effluent from the Trickling Filter Solids Contact (TFSC) process.

2.6 Metals

The concentrations of seven metals (cadmium, chromium, copper, lead, nickel, silver, and zinc) are monitored monthly by OC San. The results of these analyses are used to evaluate efficiencies, trend inputs from discrete sources, and detect elevated concentrations in the secondary facilities, anaerobic digesters, and dewatered sludges.

The average metal concentrations in OC San’s influent and effluent for the last five years are shown in Table 2.6.

Table 2.6 Average Metal Mass (pounds per day) in the Influent and Effluent for Fiscal Years 2017/18-2021/22 Orange County Sanitation District, Resource Protection Division											
Constituent	INFLUENT					EFFLUENT					
	17-18	18-19	19-20	20-21	21-22	17-18	18-19	19-20	20-21	21-22	
Cadmium	2	2	1	0.6	0.6	0.02	ND	0.02	ND	ND	
Chromium	12	12	11	10	9	0.5	0.7	0.9	1	1.4	
Copper	161	165	149	120	105	4	3	4	4	5.3	
Lead	4	4	4	4	3.2	0.05	0.05	0.4	0.4	0.4	
Nickel	18	16	15	16	12.8	8	7	7	7	8	
Silver	2	2	1	1	1	ND	ND	ND	ND	ND	
Zinc	286	274	248	221	215	22	20	21	21	22	
Total Avg	486	476	429	372	346	35	32	33	32	37	
ND	Non-detect					2017-18	Effluent mass based on 88 MGD				
2017-18	Influent mass based on 185 MGD					2018-19	Effluent mass based on 104 MGD				
2018-19	Influent mass based on 191 MGD					2019-20	Effluent mass based on 101 MGD				
2019-20	Influent mass based on 188 MGD					2020-21	Effluent mass based on 91 MGD				
2020-21	Influent mass based on 182 MGD					2021-22	Effluent mass based on 94 MGD				
2021-22	Influent mass based on 179 MGD										

2.7 Mass Emission Benchmarks

OC San’s Permit contains mass emission benchmarks for 81 constituents as identified in Section V, B, Table 7 of Order R8-2021-0010. These mass emission benchmarks are not water-quality based effluent limits; however, OC San will use this information as part of its annual review of local limits.

The mass emission benchmarks report is required to compare each constituent’s sample result with the minimum level (ML) for that constituent in the Permit. According to Permit requirement, sample results that are less than the reported ML but greater than the method detection limit (MDL) are to be reported as zero prior to calculating the 12-month constituent average. Some of the values in the Mass Emission Benchmarks Report differ from those found in the Priority Pollutants Report, since the former relies on the ML as the threshold of detection, while the latter uses the MDL as the threshold for reporting.

As shown in Table 2.7, most of the heavy metal results fell in the range of 0.0% to 50% of their respective benchmarks. Unlike many of the benchmarked organic constituents, OC San had extensive historic heavy metals sampling frequencies and detectable levels on which to base its benchmarks. As a result, the heavy metal data has less statistical variance from the established benchmarks. With continuing improvements in the pretreatment program, the heavy metals benchmark results verify the decreasing mass emission trends, since constituents are less than their historic values. Heavy metals are covered under existing local pretreatment limits. The local limits for those constituents were evaluated as part of the revised Ordinance and local limits effective on July 1, 2016.

As shown in Table 2.7, most of the organic compounds with benchmarks were rarely detected in the effluent. More than half of the 81 constituents were not detected in OC San’s effluent and are listed as zero (0) metric tons per year emitted, and zero percent of the benchmark. Only 17 of 81 constituents exceeded 10% of their respective benchmarks. It’s worth noting that, historically, these constituents were rarely detected in OC San’s effluent, so the benchmarks could only be based on the MDL. As OC San continues to increase the sensitivity of its detection limits, some constituents may be more discernable in the future. That is, as detection limits are lowered, there will likely be fewer zero-ton-emitted constituents in OC San’s list of benchmarks.

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2021/22
Orange County Sanitation District, Resource Protection Division

Constituent	2021-22 12-Mo. Avg Benchmark	2021-22 12-Mo. Avg Actual	2021-22 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Marine Aquatic Life Toxicants									
Arsenic, total recoverable	1.88	0.39	20.74	0.314301	0.453878	12	12	87.59	3.22
Cadmium, total recoverable	0.07	0	0	0	0	12	0	87.59	0
Chromium (VI)	0.44	0.216	49.09	0.108259	0.488322	12	12	87.59	1.79
Copper, total recoverable	5.21	0.814	15.62	0.436142	2.41902	12	12	87.59	6.76
Lead, total recoverable	0.18	0.035	19.44	0	0.169375	12	7	87.59	0.3
Mercury, total recoverable	0.002	0.001	50	0.000378	0.003032	12	12	87.59	0.01
Nickel, total recoverable	6.69	1.188	17.76	0.95539	1.454576	12	12	87.59	9.82
Selenium, total recoverable	6.23	1.398	22.44	1.147136	1.733215	12	12	87.59	11.55
Silver, total recoverable	0.05	0	0	0	0	12	0	87.59	0
Zinc, total recoverable	13.09	3.377	25.8	2.940556	4.052309	12	12	87.59	27.83
Cyanide, total recoverable	1.67	0.519	31.08	0	0.85451	17	16	95.1	4.29
Ammonia as nitrogen	10,457	3801.739	36.36	3396.5502	4292.992571	20	20	91.69	31065.48
Total chlorine residual	38.09	8.023	21.06	3.03106	10.113661	1097	912	94.25	66.17
Non-chlorinated phenols	0.44	0.002	0.45	0	0.023611	12	1	87.35	0.02
Chlorinated phenols	0.15	0	0	0	0	12	0	87.35	0
Endosulfan	0.003	0	0	0	0	2	0	96.51	0
Endrin	0.006	0	0	0	0	2	0	96.51	0
Hexachlorocyclohexane (HCH)	0.003	0	0	0	0	2	0	96.51	0
Radioactivity	--								
Human Health Toxicants – Non-Carcinogens									
Acrolein	3.03	0	0	0	0	4	0	88.46	0
Antimony	0.72	0.151	20.97	0.138408	0.190015	12	12	87.59	1.25
Bis(2-chloroethoxy) methane	3.03	0	0	0	0	12	0	87.35	0
Bis(2-chloroiso-propyl) ether	1.21	0	0	0	0	12	0	87.35	0
Chlorobenzene	1.21	0	0	0	0	4	0	88.46	0
Chromium (III)	0.44	0.216	49.09	0.108259	0.488322	12	12	87.59	1.79
Di-n-butyl-phthalate	0.51	0	0	0	0	12	0	87.35	0
Dichlorobenzenes	0.61	0	0	0	0	12	0	87.35	0
Diethyl phthalate	0.22	0.027	12.27	0	0.328578	12	1	87.35	0.21
Dimethyl phthalate	1.21	0	0	0	0	12	0	87.35	0
4,6-dinitro-2-methylphenol	3.03	0	0	0	0	12	0	87.35	0
2,4-dinitrophenol	3.03	0	0	0	0	12	0	87.35	0
Ethylbenzene	1.21	0	0	0	0	4	0	88.46	0
Fluoranthene	0.61	0	0	0	0	12	0	87.35	0
Hexachlorocyclopentadiene	3.03	0	0	0	0	12	0	87.35	0
Nitrobenzene	0.11	0	0	0	0	12	0	87.35	0

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2021/22
Orange County Sanitation District, Resource Protection Division

Constituent	2021-22 12-Mo. Avg Benchmark	2021-22 12-Mo. Avg Actual	2021-22 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
Thallium	0.06	0	0	0	0	12	0	87.59	0
Toluene	0.05	0	0	0	0	4	0	88.46	0
Tributyltin	0.07	0	0	0	0	3	0	93.17	0
1,1,1-trichloroethane	1.21	0	0	0	0	4	0	88.46	0
Human Health Toxicants – Carcinogens									
Acrylonitrile	1.21	0	0	0	0	4	0	88.46	0
Aldrin	0.001	0	0	0	0	2	0	96.51	0
Benzene	1.21	0	0	0	0	4	0	88.46	0
Benzidine	0.004	0	0	0	0	12	0	87.35	0
Beryllium	0.30	0	0	0	0	12	0	87.59	0
Bis(2-chloroethyl) ether	0.61	0	0	0	0	12	0	87.35	0
Bis(2-ethylhexyl) phthalate	1.11	0	0	0	0	12	0	87.35	0
Carbon tetrachloride	1.21	0	0	0	0	4	0	88.46	0
Chlordane	0.001	0	0	0	0	2	0	96.51	0
Chlorodibromomethane	1.21	0.039	3.22	0	0.154646	4	1	88.46	0.32
Chloroform	4.72	0.897	19	0.669238	1.183944	4	4	88.46	7.28
DDT	0.003	0	0	0	0	2	0	96.51	0
1,4-dichlorobenzene	0.12	0	0	0	0	12	0	87.35	0
3,3'-dichlorobenzidine	0.42	0	0	0	0	12	0	87.35	0
1,2-dichloroethane	1.21	0	0	0	0	4	0	88.46	0
1,1-dichloroethylene	1.21	0	0	0	0	4	0	88.46	0
Dichlorobromomethane	2.56	0.358	13.98	0.192713	0.431061	4	4	88.46	2.91
Dichloromethane	1.21	0.186	15.37	0	0.742819	4	1	88.46	1.59
1,3-dichloropropene	1.21	0	0	0	0	4	0	88.46	0
Dieldrin	0.002	0	0	0	0	2	0	96.51	0
2,4-dinitrotoluene	3.03	0	0	0	0	12	0	87.35	0
1,2-diphenylhydrazine	0.61	0	0	0	0	12	0	87.35	0
Halomethanes	0.12	0.024	20	0	0.076105	4	2	88.46	0.19
Heptachlor	0.003	0	0	0	0	2	0	96.51	0
Heptachlor epoxide	0.001	0	0	0	0	2	0	96.51	0
Hexachlorobenzene	0.01	0	0	0	0	12	0	87.35	0
Hexachlorobutadiene	0.61	0	0	0	0	12	0	87.35	0
Hexachloroethane	0.61	0	0	0	0	12	0	87.35	0
Isophorone	0.61	0	0	0	0	12	0	87.35	0
N-nitrosodimethylamine	3.03	0	0	0	0	12	0	87.35	0
N-nitrosodi-n-propylamine	3.03	0	0	0	0	12	0	87.35	0
N-nitrosodiphenylamine	0.61	0	0	0	0	12	0	87.35	0
PAHs	0.45	0	0	0	0	12	0	87.35	0

Table 2.7 Mass Emissions for All Benchmark Constituents – Fiscal Year 2021/22
 Orange County Sanitation District, Resource Protection Division

Constituent	2021-22 12-Mo. Avg Benchmark	2021-22 12-Mo. Avg Actual	2021-22 Percent of Benchmark	Min. Mass	Max. Mass	Sample Freq.	Freq. Detected	Avg. Flow	Avg. Conc.
	MT/Year ^A	MT/Year ^A	Percent	MT/Year	MT/Year	Count	Count	MGD	(µg/L)
PCBs	0.001	0	0	0	0	2	0	96.51	0
TCDD equivalents	0.000000201	0	0	0	0	4	0	89.28	0
1,1,2,2-tetrachloroethane	1.21	0	0	0	0	4	0	88.46	0
Tetrachloroethylene	0.45	0	0	0	0	4	0	88.46	0
Toxaphene	0.01	0	0	0	0	2	0	96.51	0
Trichloroethylene	1.21	0	0	0	0	4	0	88.46	0
1,1,2-trichloroethane	1.21	0	0	0	0	4	0	88.46	0
2,4,6-trichlorophenol	0.15	0	0	0	0	12	0	87.35	0
Vinyl chloride	1.21	0	0	0	0	4	0	88.46	0

^A Metric Tons

2.8 Performance Goals

OC San's NPDES Permit (NPDES No. CA0110604, Order No. R8-2021-0010) was renewed and became effective August 1, 2021. Performance goals were added to the Permit for Discharge Point 001 (Section V, B, Table 7 of Permit) and were developed based upon actual performance data from OC San's treatment plants during the final five years of the prior NPDES permit cycle. Performance goals are used as an indication of the efficiency of the treatment systems and are not enforceable effluent limitations or standards for the regulation of discharge from the treatment facility. The Permit states that performance goals are *"intended to minimize pollutant loading (primarily for toxics), while maintaining the incentive for future voluntary improvement of water quality whenever feasible, without the imposition of more stringent limits based on improved performance."*

OC San is required to monitor effluent data for performance goal exceedances. If there are two consecutive exceedances of the performance goals, OC San shall initiate an investigation into the cause of the exceedance. If the exceedance continues for three consecutive monitoring periods, OC San is required to submit a written report to the SARWQCB and USEPA on the nature of the exceedance, the results of the investigation, and cause of the exceedance.

Since the Permit went into effect on August 1, 2021, two constituents incurred concentration performance goal exceedances over two or more consecutive months. Total chromium (chromium) exceeded the performance goal for three consecutive months and total recoverable cyanide (total cyanide) exceeded the performance goal for two consecutive months:

Table 2.8 Fiscal Year 2021-2022 Monthly Performance Goals for Parameters with Three Consecutive Monthly Exceedances Orange County Sanitation District, Resource Protection Division							
Parameter	Performance Goal	First Exceedance		Second Exceedance		Third Exceedance	
Chromium ⁽¹⁾	1.55 µg/L	Sept 2021	3.76 µg/L	Oct. 2021	4.29 µg/L	Nov. 2021	2.68 µg/L

⁽¹⁾ The discharger may at its option meet both the chromium III and the chromium VI performance goals or mass emission benchmarks by analyzing for total recoverable chromium (2021 NPDES Permit).

On November 1, 2021, OC San commenced investigating cause(s) of the first two consecutive chromium exceedances. OC San confirmed that these samples were only analyzed for total chromium, which has the same 1.55 µg/L performance goal as each of the individual constituents that make up total chromium: hexavalent chromium, Cr(VI) and trivalent chromium, Cr(III). When comparing equivalent mass emission rates against the chromium mass emission benchmarks (0.44 metric tons per year [MT/yr] on a 12-month average basis for both Cr(III) and Cr(VI), OC San determined that the monthly performance goal concentrations were below an equivalent 12-month maximum average concentration (~3.48 µg/L) required to remain below the mass emission benchmarks. OC San also that the measured total chromium effluent concentrations remained at or below the water quality objectives for Cr(III) at 190,000 µg/L and Cr(VI) at 2 µg/L.

In May 2022 OC San initiated a year-long special project to determine whether its effluent total chromium concentrations are originating from Cr(VI) and/or Cr(III) by speciating total chromium. Initial work indicates that the measured total chromium is entirely attributed to Cr(III). OC San obtained approval from SARWQCB and EPA prior to commencing speciation and will continue to provide updates to both agencies throughout the course of the project

There were two consecutive exceedances of the performance goal for total cyanide, as follows:

Table 2.9 Fiscal Year 2021-2022 Monthly Performance Goals for Parameters with Two Consecutive Monthly Exceedances Orange County Sanitation District, Resource Protection Division					
Parameter	Performance Goal	First Exceedance		Second Exceedance	
Cyanide	5.88 µg/L	Sept. 2021	6.96 µg/L	Oct. 2021	6.08 µg/L

Starting September 2021, OC San conducted a series of investigations to determine cause(s) of the Total Cyanide performance goal exceedances. Investigations included examining historical data, conducting literature research, evaluating the three contributing process streams to OC San’s final effluent, and conducting a controlled lab experiment. Based on the findings, OC San attributes the most likely cause of the performance goal exceedances to matrix interferences from the GWRS’ reverse osmosis concentrate (ROC) process stream which is one of the three contributing streams to OC San’s final effluent.

Sodium hydroxide (NaOH) is used to preserve effluent samples for cyanide analysis, and it was determined that GWRS’s ROC contains chloramine which can react with sample matrices in the presence of NaOH to create cyanide signals. This phenomenon was reported in literature and by other wastewater agencies who later obtained regulatory approval to modify their sample preservation processes to reduce the potential matrix interferences.

To further evaluate this phenomena, OC San conducted a lab experiment, which showed that the effluent and ROC samples (analyzed without NaOH preservation or after dechlorination) yielded much lower (up to 10-fold) Total Cyanide results compared to samples that were preserved with NaOH. Although the lab experimental findings further supported that NaOH preservation of chlorinated wastewater creates Total Cyanide signals, occurrence of this matrix interference seems to be sporadic, as there hasn’t been any additional performance goal exceedances since October 2021. This sporadic occurrence could be due to 1) chloramine forming during chlorination at the beginning of the treatment train and/or 2) potentially varying degrees of decreases in chloramine concentrations along the treatment train resulting in variable concentrations of chloramine in ROC. Notably, ROC is currently a minor contributing stream (i.e., approximately 18 percent) to OC San’s final effluent. However, it is possible that the matrix interferences will be intensified once ROC becomes a larger contributor to OC San’s final effluent upon completion of GWRS Final Expansion. As such, OC San is currently considering two options to reduce matrix interferences: 1) eliminating the sample preservation step and 2) exploring a different cyanide method that is more robust against interference. OC San may proceed with one or both options depending on laboratory staffing level and/or availability of new instrument to support a different cyanide method.

As OC San continues to upgrade its facilities to support GWRS Final Expansion, the 5-year performance data upon which the permitted performance goals were based are expected to diverge from future plant performance data due to the additional 30 MGD of water reclamation. The Permit writers were informed of these operational improvements in advance and inserted provisions within the Permit to allow OC San to request Permit modifications to support additional water reuse.

Data for each parameter with a performance goal is presented in Table 2.10, and OC San intends to consider these values as part of its annual review of local limits.

Table 2.10 Performance Goal Data for Fiscal Year 2021-2022
Orange County Sanitation District, Resource Protection Division

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2021*	Aug 2021	Sep 2021	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022	Mar 2022	Apr 2022	May 2022	Jun 2022
			(µg/L)											
Marine Aquatic Life Toxicants														
Arsenic, total recoverable	6.62	0	3.64	3.51	3.29	3.60	3.56	2.77	2.77	2.98	3.19	3.40	3.26	2.70
Cadmium, total recoverable	0.24	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chromium (VI)	1.55	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	ND	ND
Chromium (Total)			1.21	1.32	3.76	4.29	2.68	1.20	1.16	1.55	1.18	1.13	0.97	0.97
Copper, total recoverable	18.31	1	19.4	5.00	3.66	15.6	3.74	5.22	4.08	5.54	5.74	4.62	4.24	4.22
Lead, total recoverable	0.62	2	0.89	0.35	0.24	1.51	ND	ND	ND	ND	0.22	ND	0.17	0.20
Mercury, total recoverable	0.0071	1	0.0042	0.004	0.0045	0.0049	0.026	0.0053	0.004	0.0041	0.004	0.0041	0.0032	0.005
Nickel, total recoverable	23.50	0	8.29	8.22	11.2	12.5	9.72	10.9	8.00	10.4	10.6	11.0	8.78	8.28
Selenium, total recoverable	21.90	0	13.9	11.2	11.5	13.0	12.1	10.4	9.86	10.7	9.54	10.7	14.1	11.6
Silver, total recoverable	0.16	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Zinc, total recoverable	46.01	0	28.3	25.3	25.8	30.3	26.2	28.2	28.4	29.1	33.5	26.3	26.2	26.3
Cyanide, total recoverable	5.88	2	4.63	ND	6.95	6.08	3.61	4.73	5.07	2.94	4.12	5.66	3.83	4.17
Ammonia as nitrogen	36,743	0	30,748	23,069	27,320	30,194	34,253	34,971	33,523	34,957	32,290	28,200	32,868	30,786
Non-chlorinated phenols	1.56	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.2	ND
Chlorinated phenols	0.54	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Endosulfan	0.011	0	ND	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Endrin	0.021	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorocyclohexane (HCH)	0.011	0	ND	NA	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA
Human Health Toxicants – Non-Carcinogens														
Acrolein	10.65	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Antimony	2.54	0	1.11	1.27	1.08	1.31	1.23	1.32	1.14	1.11	1.17	1.65	1.29	1.36
Bis(2-chloroethoxy) methane	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bis(2-chloroiso-propyl) ether	4.26	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Chromium (III)	1.55	3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.97	0.97
Chromium (Total)			1.21	1.32	3.76	4.29	2.68	1.20	1.16	1.55	1.18	1.13	0.97	0.97
Di-n-butyl-phthalate	1.80	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dichlorobenzenes	2.13	1	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Diethyl phthalate	0.76	1	ND	ND	2.53	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dimethyl phthalate	4.26	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
4,6-dinitro-2-methylphenol	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Table 2.10 Performance Goal Data for Fiscal Year 2021-2022
Orange County Sanitation District, Resource Protection Division

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2021*	Aug 2021	Sep 2021	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022	Mar 2022	Apr 2022	May 2022	Jun 2022
			(µg/L)											
2,4-dinitrophenol	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Fluoranthene	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Hexachlorocyclopentadiene	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Nitrobenzene	0.38	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Thallium	0.20	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	0.19	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Tributyltin	0.25	0	NA	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,1,1-trichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Human Health Toxicants – Carcinogens														
Acrylonitrile	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Aldrin	0.004	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Benzene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Beryllium	1.07	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bis(2-chloroethyl) ether	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bis(2-ethylhexyl) phthalate	3.90	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon tetrachloride	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Chlordane	0.004	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Chlorodibromomethane	4.25	0	1.27	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Chloroform	16.60	0	6.99	NA	NA	5.73	NA	NA	9.09	NA	NA	7.29	NA	NA
DDT	0.011	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
1,4-dichlorobenzene	0.43	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
3,3'-dichlorobenzidine	1.47	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2-dichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,1-dichloroethylene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Dichlorobromomethane	8.98	0	3.54	NA	NA	1.65	NA	NA	3.01	NA	NA	3.43	NA	NA
Dichloromethane	4.26	1	ND	NA	NA	6.36	NA	NA	ND	NA	NA	ND	NA	NA
1,3-dichloropropene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Dieldrin	0.007	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
2,4-dinitrotoluene	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2-diphenylhydrazine	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Halomethanes	0.43	1	0.625	NA	NA	ND	NA	NA	ND	NA	NA	0.152	NA	NA
Heptachlor	0.009	1	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA

Table 2.10 Performance Goal Data for Fiscal Year 2021-2022
 Orange County Sanitation District, Resource Protection Division

Constituent	Performance Goal (µg/L)	Number of elevated results	Jul 2021*	Aug 2021	Sep 2021	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022	Mar 2022	Apr 2022	May 2022	Jun 2022
			(µg/L)											
Heptachlor epoxide	0.004	0	ND	NA	NA	NA	NA	NA	ND	NA	NA	NA	NA	NA
Hexachlorobutadiene	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Hexachloroethane	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Isophorone	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
N-nitrosodimethylamine	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
N-nitrosodi-n-propylamine	10.65	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
N-nitrosodiphenylamine	2.13	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
PAHs	1.59	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2,2-tetrachloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Tetrachloroethylene	1.58	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
Trichloroethylene	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
1,1,2-trichloroethane	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA
2,4,6-trichlorophenol	0.54	0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Vinyl chloride	4.26	0	ND	NA	NA	ND	NA	NA	ND	NA	NA	ND	NA	NA

*Note that Order R8-2021-0010 was adopted on August 1, 2021. Where available, data for July 2021 is presented for continuity of fiscal year reporting, otherwise, constituent(s) not analyzed.

ND – not detected at a concentration greater than the method detection limit

NA – not analyzed

Chapter 3. Permits

3.1 Introduction

The Orange County Sanitation District (OC San) implements permitting and certification control mechanisms which contain effluent limits for all standards, statements of duration and non-transferability, self-monitoring, sampling, reporting, record-keeping, notification requirements, and statements of applicable civil and criminal penalties for discharge violations. The following sections describe permit classifications and the methods by which permittees are identified and discharge limits are established.

3.2 Permit Classifications

There are seven permit and certification classifications for users that discharge to OC San's sewerage system: Class I, Class II, Wastehaulers, Special Purpose, Dry Weather Urban Runoff Diversion, FOG (fats, oils, and grease), and Discharge Certifications.

Class I Permits

Class I dischargers are defined as Significant Industrial Users (SIUs) in accordance with federal regulations. Examples of these users include metal finishers, printed circuit board shops, large food processors, textile companies, and industries with the potential to discharge constituents of concern. A listing of the Class I permittees is provided in Appendix A.

A Class I permit is issued to any user who meets any one of the following conditions:

1. Is subject to Federal Categorical Pretreatment Standards, or
2. Discharges an average of 25,000 gallons per day or more of process wastewater to the POTW, or
3. Contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the OC San POTW, or
4. Has a reasonable potential for adversely affecting OC San's operation or for violating any Pretreatment Standard, Local Limit, or requirement, or
5. May cause pass through or interference with OC San's sewerage facilities.

Class II Permits

Class II permittees include commercial enterprises such as restaurants, supermarkets, large entertainment/service venues, or other high-use non-SIU.

A Class II permit is issued to any user who meets all the following conditions:

1. Has a charge for use greater than the special assessment OC San sewer use fee included on the County of Orange secured property tax bill, and
2. Discharges waste other than sanitary, and
3. Is not otherwise required to obtain a Class I permit.

Wastehauler Permits

Wastehauler permits are issued to those users who are engaged in vehicular transport and subsequent disposal of biodegradable waste into OC San's system. Wastehauler permittees dispose of septic tank/cesspool, restaurant grease trap, and portable toilet wastes at OC San's dedicated disposal facility located at Reclamation Plant No. 1 in Fountain Valley. The discharge of industrial wastewater by any wastehauler is prohibited unless written authorization from OC San has been obtained.

Special Purpose Discharge Permits

SPDPs are issued to dischargers for the purpose of discharging groundwater, surface run-off, subsurface drainage, or unpolluted water directly or indirectly to OC San's facilities when no alternative method of disposal is reasonably available, or to mitigate an environmental risk or health hazard. This primarily includes groundwater remediation and construction dewatering projects.

FOG (Fats, Oils, and Grease) Permits

OC San administers the local FOG Control Program for FSEs that discharge directly to OC San-owned sewer pipelines. Ordinance OCSD-25 provides for the establishment of the FOG Control Program and the enforcement of program requirements by OC San's Resource Protection Division. The goal of the program is to eliminate sanitary sewer overflows (SSOs) which are caused by discharges from FSEs. Additional information can be found in Chapter 9.

Discharge Certifications

A Discharge Certification may be issued to non-categorical industries that generate wastewater containing pollutants of concern and have the potential for violating any pretreatment standard or requirement. Zero Discharge Certifications are issued to those industries that have operations subject to a federal category regulated by the US EPA, but do not discharge industrial wastewater generated from these operations to the sewer.

3.3 Permit Issuance

During FY 2021/22, the pretreatment program managed a total of 547 active permits/certifications. A total of 49 new permits were issued, including 26 Class I permits, 6 FOG permits, nine wastehauler permits, two zero-discharge certifications, and six special purpose discharge permits. Forty-five permits were listed as void or expired during the fiscal year (most due to ownership, location, or class changes and subsequent re-issuances), including 27 Class I permits, three Class II permits, one dry weather urban runoff permit, five FOG permits, seven Special Purpose Discharge Permits, and two wastehauler permits. Of the 344 Class I permits (SIUs), 186 were subject to Federal Categorical Pretreatment Standards. Of the seven Special Purpose Discharge Permits that were voided/expired, and the six newly issued Special Purpose Discharge Permits, two of these were short-term issuances, that is, newly issued and voided or expired during the same reporting period. Similarly, one newly-issued Class I permit was issued and voided within the FY 2021/22 reporting period. This level of permit activity represents no significant change compared to the total number of active permits at the end of the previous fiscal year.

3.3.1 Identification of New Permittees

OC San surveys various sources for companies that may require a control mechanism, including those that are subject to Federal Categorical Standards or local limits. Wastewater discharge permits are issued to those businesses as required. OC San obtains new business information from the following:

- City Business Licensing Departments
- Santa Ana Regional Water Quality Control Board's permit database
- OC San Engineering Department connection permits
- OC San Finance Department new sewer service referrals
- *OC Register* newspaper
- Agency referrals during Strike Force meetings
- Currently permitted industries

Historically, most new permittees had been identified by OC San field inspectors during the course of inspecting existing permittees, and when following up on new industries that move into a former permittee's

company location. Since 2018, OC San has collaborated with all of its member agencies and set up an ongoing program to collect data on all new and renewed business licenses. The initial effort collected data quarterly to space out the license review, but the program now collects data on a semiannual basis to stay current. The initial effort also included a plan for OC San to identify industrial dischargers from county and unincorporated areas where business licenses are not issued. These areas require physical searches to ensure that OC San's entire service area is evaluated to comply with US EPA's requirements for a comprehensive Industrial Waste Survey.

3.4 Discharge Limits

3.4.1 Industrial

In 1976, OC San established discharge limits for specific pollutants. These limits became increasingly restrictive over a three-phased implementation period designed to give industry adequate time to comply with the more stringent standards. The limits were adopted by OC San's Boards of Directors in 1976 and were published in OC San's Ordinance. New concentration limits were adopted in the revised Ordinance, which became effective July 1, 1983.

On September 8, 1989, the Boards of Directors adopted a new ordinance which contained essentially the same concentration limits as the previous ordinance. Revisions included the creation of a specific limit of 0.1 milligrams per liter (mg/L) for polychlorinated biphenyls (PCB), a limit of 0.1 mg/L for pesticides, and specific limits for wastehaulers. It also included specific discharge limits for biochemical oxygen demand (BOD); the maximum BOD limit was 15,000 pounds per day (lb/d). These BOD limits were established to prevent pass-through and interference.

The 1989 Ordinance was subsequently revised in February 1992, July 1998, July 2007, July 2008, and October 2009, but with no change to the local discharge limits. Since the implementation of the Federal Categorical Standards in April 1984, OC San applies the more stringent of either the Federal Categorical Standards or OC San's local discharge limits. In 2016, OC San completed a local limits study and revised its ordinance per US EPA audit findings, effective July 1, 2016. The 2016 Ordinance removed the numeric BOD concentration limit; removed the cyanide amenable and Total Toxic Organic limits; revised chromium and silver limits; and added 1,4-dioxane, molybdenum, and selenium limits. The 2016 Ordinance was revised in July 2019, but with no change in the local discharge limits. As of this reporting period, the limits set in 2016 are still in effect and shown in Table 3.1.

Constituent	Limit (mg/L)	Constituent	Limit (mg/L)
1,4-Dioxane	1.0	Nickel	10.0
Arsenic	2.0	Oil and Grease of Mineral or Petroleum Origin	100.0
Cadmium	1.0	Pesticides	0.01
Chromium (Total)	20.0	Polychlorinated Biphenyls (PCB)	0.01
Copper	3.0	Selenium	3.9
Cyanide (Total)	5.0	Silver	15.0
Lead	2.0	Sulfide (Dissolved)	0.5
Mercury	0.03	Sulfide (Total)	5.0
Molybdenum	2.3	Zinc	10.0

3.4.2 Wastehaulers

After evaluating reference materials from the US EPA and laboratory results from wastehauler samples taken by OC San, pollutant limits were established for wastehaulers discharging biodegradable waste that express the maximum expected heavy metal concentrations for domestic wastes found in septic tank/cesspool wastes. These limits are shown in Table 3.2.

Table 3.2 OC San's Maximum Allowable Discharge Limits for Wastehaulers Discharging Domestic Septage to OC San Wastehauler Stations Orange County Sanitation District, Resource Protection Division	
Constituent	Limit (mg/L)
Cadmium	1.0
Chromium	35.0
Copper	25.0
Lead	10.0
Nickel	10.0
Zinc	50.0

3.5 Establishing Mass Emission Rates (MER)

OC San uses a dual approach to regulating wastewater constituents. Most Class I permits are issued both concentration-based limits and mass emission limits to encourage water conservation, waste minimization, and recycling; to limit the total mass of pollutants that enter the treatment facilities; and to deter facilities from achieving compliance through dilution. For concentration limits, OC San applies either the Federal Categorical Standards or OC San's local discharge limits (shown in Table 3.2), whichever are more stringent. Mass emission rate limits are calculated using the applicable concentration limits in combination with an industry's multi-year average wastewater flow (referred to as a "flow base" rate). The flow base rate is determined at the time a permit is initially issued, renewed, or revised.

The volume of wastewater used in establishing a permittee's limits is based on flow rate data, water meter information, or additional reports submitted to OC San. Unless additional water losses can be substantiated, or another batch, process, or effluent meter measurement device is in place, 95% of the influent city water meter reading is considered to be discharged to the sewer. The remaining 5% is a standard allowance for losses in process, evaporation, and landscape use. An allowance for domestic waste is computed based on a daily usage rate of 25 gallons per employee per 8-hour shift. If there is documentation showing other water losses, such as product water loss or boiler loss, that are greater than the standard 5% deduction, then adjustments can be made to accommodate these losses. If water conservation beyond normal industrial practice takes place, the flow base may be adjusted to account for water conservation and/or water recycling.

The user's annual average industrial wastewater discharge, calculated as described above, is divided by the number of operational discharge days per year to yield the net discharge in gallons per day. OC San can use the mass limit (expressed in lb/d) as an evaluation tool, if a permittee is introducing large quantities of water in an attempt to dilute concentrations to meet categorical requirements. In order to maintain long-term compliance with permit limits and conditions, a permittee must evaluate pretreatment capacity as a result of a change in production and subsequent change in wastewater discharge.

If a permittee exceeds the MER or concentration waste discharge limits, the permittee is subject to enforcement action(s) in accordance with OC San's Ordinance and *Enforcement Response Plan*, which may include administrative penalties.

Chapter 4. Inspection, Sampling, Compliance, & Enforcement

4.1 Introduction

This chapter details the inspection, sampling, and enforcement activities of the OC San Industrial Pretreatment Program for FY 2021/22.

The goal of OC San's Industrial Pretreatment Program is to ensure that dischargers maintain compliance with Federal Pretreatment Standards and the Ordinance and discharge limits through monitoring and verification, in addition to controlling and reducing industrial pollutants.

An individual industrial discharge status summary of all Class I permittees is provided in the Monitoring and Compliance Status Report for FY 2021/22 (Appendix A). The following sections describe OC San's inspection, monitoring and enforcement efforts, and summarize permittees' compliance with US EPA Categorical Standards and OC San's local discharge limits.

4.2 Routine Inspection and Sampling

OC San's Source Control Inspection group consists of one supervisor, one principal environmental specialist, 10 field inspectors, three technicians, and one administrative assistant. Inspectors provide a visible presence at industrial facilities and deter non-compliant conduct through on-site sampling and inspections. The inspectors perform inspections at each permittee's facility at least once per calendar quarter. Discharge samples are taken during each inspection for all pertinent regulated constituents based on permit requirements.

Inspections may include an evaluation of manufacturing plant processes and pretreatment equipment to observe and discuss changes, verification of waste manifests and other waste disposal documents, measurement of industrial wastewater flows, field testing and sample collection of wastewater, and a review of regulations, policies, and procedures for the implementation of the pretreatment program.

Composite samples of a permittee's discharge are collected using automatic samplers and are time-composited over a 24-hour period. US EPA sampling guidelines are used by the Source Control Inspectors for collecting and preserving samples. In conjunction with each inspector's on-site observations, the results of laboratory analyses are used to verify compliance status, help disclose potential operational and housekeeping problems, evaluate the adequacy of pretreatment systems, and detect new sources of regulated substances. Grab samples are collected for the determination of compliance with TTOs, cyanides, oil and grease, and pH.

During FY 2021/22, OC San staff conducted 1,611 inspections and collected 3,648 samples. Compared to last fiscal year, the number of conducted inspections decreased this year by 3%; however, the number of samples increased by 4% (Table 4.1).

	Fiscal Years				
	2017-18	2018-19	2019-20	2020-21	2021-22
Inspections*	1,192	1,362	1,422	1,664	1,611
Samples Collected	3,406	3,235	3,831	3,515	3,648

*Site visits to facilities to assess compliance.

4.3 Non-Routine Sampling and Inspection

OC San Source Control Inspection staff perform duties beyond routine sampling and inspection, as summarized below:

- Enforcement inspections are performed in response to compliance problems and typically involve close cooperation with the permittee to identify and correct deficiencies. Source Control Inspectors resample noncompliant industries within 30 days from the date the violation is issued and submit compliance inspection reports to document corrective measures taken and to support enforcement actions.
- Inspectors participate in multi-agency operations such as warrant inspections and environmental audits, working jointly with other agencies enables inspectors to recognize potential problems in other regulatory areas such as air quality and hazardous waste.
- Chronic violators are subject to increased monitoring and inspection activity, which may include extended periods of on-site sampling.
- Source Control Inspectors perform routine sampling for cyanide at facilities that have cyanide processes on site. The sampling occurs at the end of cyanide treatment or at the end of the cyanide process, prior to comingling with non-cyanide bearing wastestreams. The purpose of this sampling is to confirm that all cyanide-bearing wastewater is treated.
- Random sampling throughout the collection system is performed in areas where there is an increased potential for illegal dumping by industries. These sampling events are generally precursors to downstream monitoring projects (described in Section 4.3.1) when illicit discharging is suspected.
- Field support is provided to the Non-Industrial Source Control (NISC) team within the Resource Protection Division in support of their ongoing programs, including inspections at 10 radiator shops and quarterly sampling at 20 Dry-Weather Urban Runoff diversions.
- Providing resources to OC San's operations, collections, compliance, and laboratory groups in performing sampling and inspections in relation to special studies or ongoing projects.
- On a monthly basis Source Control Inspection staff collect composite samples on each of OC San's 12 trunklines at both OC San plants for several days to one week. This monitoring allows OC San to identify any potential problems on individual trunklines, as well as to study the correlation between influent, effluent, and biosolids.

4.3.1 Downstream Sampling

Covert sampling is conducted downstream of an industry to verify continued discharge compliance or to identify illicit discharges. Sampling is conducted both upstream and downstream to isolate the industry's discharge. This sampling is performed in manhole structures in local sewer systems over the course of several days.

Three downstream monitoring events were conducted during FY 2021/22.

4.4 Orange County Hazardous Materials Strike Force and Joint Agency Inspections

The Orange County Strike Force is comprised of state, county, city and other local agencies capable of identifying, investigating, and prosecuting dischargers of hazardous materials to the environment. The initial goals of the Strike Force were to define the roles and responsibilities of each participating agency; establish the scope of the cases to be handled; emphasize cooperative identification, investigation, and prosecution of violators; and develop protocols among all participating agencies to create a coordinated enforcement system. An overall protocol was adopted by the Orange County Board of Supervisors in June 1988. The Orange County District Attorney's Office conducts monthly Strike Force meetings to discuss investigative strategies, ongoing investigations/cases, and identification of potential new cases.

OC San staff spent approximately 50 hours assisting the Strike Force in FY 2021/22 by attending meetings and conducting fieldwork in support of Strike Force activities. In FY 2021/22, OC San performed inspection related activities involving Strike Force referrals or investigations.

OC San participates in joint agency inspections of industries suspected of violating hazardous waste and sewer discharge regulations. This cooperative effort involves other agencies such as the Orange County Health Care Agency and the Orange County District Attorney's Office, responsible for environmental management and citizen safety. OC San conducts both referral-based and agency independent inspections as well as joint inspections with other agencies when necessary. These inspections aided in correcting existing and potential discharge problems and provide for collaborative enforcement opportunities between participating agencies.

4.5 Industrial Compliance Status with Discharge Limits

OC San monitors and evaluates the compliance status of all regulated industries to determine the applicability of additional enforcement actions. Analytical monitoring results are reviewed by the source control supervisor, and limit exceedances are investigated and re-sampled to determine if the cause is a chronic problem. Additionally, should the inspectors identify any deficiencies in an industry's process, treatment, and/or discharge system, the industry is notified of the situation, findings are documented in inspection reports and discussed with permit engineers, and corrective measures as required are communicated to the industry to be implemented. A summary of the significant industrial users' compliance status for FY 2021/22 is shown in Appendix A.

4.5.1 Industries in Significant Noncompliance (SNC)

At the end of each quarter, OC San is required to evaluate their industrial users' compliance status using a six-month time frame. Under this system, each industrial user is evaluated for SNC four times during the year, and the total evaluation period covers 15 months (i.e., beginning with the last quarter of the previous pretreatment year, through the end of the current year). OC San is required to annually publish in the local newspaper all industrial users that have been identified as SNC during the past year when the SNC criteria were met during any of the previous four quarters. If a facility has been determined to be in SNC based solely on violations which occurred in the first quarter of the 15-month evaluation (i.e., the last quarter of the previous pretreatment year) and the facility has demonstrated consistent compliance in the subsequent four quarters, then OC San is not required to publish the industrial user (IU) in the newspaper if the IU was published in the previous year for the same violations.

As of June 30, 2022, of the active 344 Class I permittees, there were 27 (7.9%) that had been classified as SNC; 18 of these were categorical industries, and 9 were non-categorical. An industry was determined to be SNC if it incurred a violation that met one or more of the criteria listed below as provided in 40 CFR, Part 403.

- Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits.
- Technical Review Criteria (TRC) violations, also known as "acute violations," defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a Pretreatment Standard or Requirement, (daily maximum, long-term average, instantaneous limit, or narrative Standard) that the POTW ("Publicly Owned Treatment Works," which in this case is OC San) determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public).
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or

to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.

- Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.
- Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.
- Failure to accurately report noncompliance.
- Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment Program.

A summary of the permittees in SNC is presented in Table 4.2. The SNC list was published in the October 21, 2022 issue of the Orange County Register; a copy of the announcement is presented in Appendix E.

Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2021/22 Orange County Sanitation District, Resource Protection Division			
Company Name	Permit No	Category	City
<i>Industries SNC Due to Discharge Violations</i>			
Embee Processing (Anodize)	1-600456	Electroplating, Metal Finishing	Santa Ana
Hartwell Corporation	1-021381	OCSD Local Limits	Placentia
Linco Industries, Inc.	1-021253	Metal Finishing	Anaheim
Sanitor Corporation	1-601267	Pharmaceutical Manufacturing, Soap And Detergent Manufacturing	Stanton
<i>Industries SNC Due to Reporting Violations</i>			
Alliance Medical Products, Inc.	1-541182	Pharmaceutical Manufacturing	Irvine
Allied International	1-031107	Soap And Detergent Manufacturing	Buena Park
Andres Technical Plating	1-521798	Metal Finishing	Placentia
Avid Bioservices, Inc.	1-571332	Pharmaceutical Manufacturing	Tustin
Blue Ribbon Container and Display, Inc.	1-601468	OCSD Local Limits	Buena Park
City of Anaheim - Public Utilities Dept	1-021073	OCSD Local Limits	Anaheim
Cooper and Brain, Inc.	1-031070	Oil and Gas Extraction	Brea
Data Aire, Inc. #2	1-021379	Metal Finishing	Orange
Excello Circuits, Inc. (Hunter)	1-601356	Metal Finishing	Anaheim
FMH Aerospace Corp.	1-600585	Aluminum Forming, Metal Finishing, Nonferrous Metals Forming And Metal Powders	Irvine
Kraft Heinz Company	1-071056	OCSD Local Limits	Irvine

Table 4.2 Summary of Companies in Significant Noncompliance (SNC) Fiscal Year 2021/22 Orange County Sanitation District, Resource Protection Division			
Company Name	Permit No	Category	City
Logi Graphics, Inc.	1-031049	Metal Finishing	Huntington Beach
Meggitt (Orange County), Inc.	1-601115	Metal Finishing	Irvine
Merical, LLC	1-600655	Pharmaceutical Manufacturing	Orange
O'Donnell Oil Company, LLC	1-581191	OCSD Local Limits	Huntington Beach
Only Cremations for Pets (Stanton)	1-601085	OCSD Local Limits	Stanton
Power Distribution, Inc.	1-511400	OCSD Local Limits	Santa Ana
Quality Aluminum Forge, LLC (Cypress North)	1-521833	Aluminum Forming	Orange
Quality Aluminum Forge, LLC (Cypress South)	1-600272	Aluminum Forming	Orange
Thompson Energy Resources, LLC (Brea)	1-601469	OCSD Local Limits	Brea
Vi-Cal Metals, Inc.	1-521846	OCSD Local Limits	Anaheim
<i>Industries SNC Due to Discharge and Reporting Violations</i>			
Amerimax Building Products, Inc.	1-021102	Coil Coating	Anaheim
Performance Powder, Inc.	1-521805	Metal Finishing	Anaheim

4.6 Enforcement Activities

During FY 2021/22, OC San initiated or continued various enforcement actions to bring industries into compliance. This section describes the types of enforcement actions taken against noncompliant SIUs. In addition, Appendix J shows a listing of pretreatment equipment that has been installed by OC San's permittees.

As provided in the Ordinance and Enforcement Response Plan, OC San has a broad range of enforcement mechanisms available, including but not limited to issuing noncompliance sampling fees, administrative penalties, notices of violation, compliance letters, probation orders, enforcement compliance schedule agreements (ECSA), instituting emergency suspension orders, permit suspension, and permit revocation orders.

OC San's enforcement program is designed to bring noncompliant industries back into compliance with Federal Pretreatment Standards and OC San's local discharge limits. If permittees violate a discharge limit, enforcement action is initiated. This includes the assessment and issuance of noncompliance sampling fees and requiring the permittee to conduct additional sampling along with OC San conducting additional sampling. Subsequent noncompliance may result in issuing an order or compliance requirement letter detailing corrective measures, requiring the installation of additional pretreatment equipment, requiring the implementation of pollution prevention measures, issuing emergency suspension orders, or suspending or revoking the wastewater discharge permit.

4.6.1 Compliance Inspections

OC San staff conduct compliance inspections to: (1) identify and address any noncompliance problems and corrective actions; and (2) verify the progress and completion of compliance requirement letters, probation orders, or enforcement compliance schedule agreements.

During FY 2021/22 OC San conducted **69 compliance inspections**.

4.6.2 Compliance Meetings

Compliance meetings are held as a result of the permittee's inability to achieve compliance with discharge requirements or to comply with OC San's Ordinance. The meetings are held with company representatives to discuss the discharge compliance problems and proposed long-term solutions.

During FY 2021/22 OC San conducted **10 compliance meetings**.

4.6.3 Compliance Requirement Letters

Compliance requirement letters are issued to require a permittee to comply with a specific condition of the permit and/or Ordinance, or to notify the permittee of an enforcement in accordance with the ERP, such as a compliance meeting.

During FY 2021/22 OC San issued **49 compliance requirement letters**.

4.6.4 Order to Cease/Terminate Noncompliance/Discharge

Orders are issued where a permittee is continually noncompliant or has committed one or more violations of the permit and/or Ordinance. The order requires a permittee to comply with a specific condition of the permit and/or Ordinance and may notify the permittee of escalated enforcement in accordance with the ERP, such as a compliance meeting.

During FY 2021/22 OC San issued **2 orders**.

4.6.5 Notices of Violation – Noncompliance Fees and Penalties

An NOV is written notification from OC San that references findings from recent sampling programs and indicates that specific violations of the permittee's discharge limits have occurred. The NOV is usually accompanied by noncompliance sampling and/or processing fees. The NOV instructs the permittee to take immediate action to correct the problem.

During FY 2021/22, OC San issued **149 notices of violations to 81 significant industrial users**.

When a permittee violates its permit limits or conditions, noncompliance fees are assessed at rates that have been adopted by OC San's Board of Directors. For FY 2021/22, noncompliance fees, penalties, settlements, interest, and judgements totaling \$82,492 were issued to SIUs (for details see Appendix D). Fees also include those from SNC permittees whose names were published in the local newspaper, and for individual self-monitoring noncompliance fees.

4.6.6 Probation Orders

Upon determination that a permittee is in noncompliance with the terms and conditions specified in its permit or any provision of OC San's Ordinance, OC San may issue a probation order. The probation order contains conditions, requirements, and a compliance schedule. The term of a probation order does not exceed ninety (90) days. The permittee is required to comply with all conditions and requirements within the time specified, including the submittal of information pertaining to waste source characterizations, pretreatment modifications, and waste minimization alternatives, and increasing the frequency of self-monitoring.

During FY 2021/22 OC San did not issue any **probation orders**.

4.6.7 Enforcement Compliance Schedule Agreement

An ECSA is an agreement between the permittee and OC San specifying that pretreatment equipment is installed or pollution prevention measures are implemented by the permittee within a scheduled time period, and that the permittee remains in consistent compliance during the term of the ECSA. The ECSA contains terms and conditions by which the permittee must operate and specifies dates for construction or acquiring and installing the pretreatment equipment and/or implementing waste minimization to achieve compliance. During the ECSA, inspection and sampling of the facilities are conducted monthly by OC San's inspectors to verify that all terms and conditions of the ECSA are met. In addition, the permittee is required to perform accelerated and extended self-monitoring.

During FY 2021/22, OC San **did not issue any enforcement compliance schedule agreements.**

4.6.8 Regulatory Compliance Schedule Agreement (RCSA)

Subsequent to the issuance of an Industrial Wastewater Discharge Permit to an industrial user, Federal Categorical Pretreatment Standards may be adopted or revised by the US EPA, or OC San may enact revised discharge limits. If the General Manager, or their designee, determines that a permittee would not be in compliance with the newly adopted or revised discharge limits, the permittee may be required to enter into a RCSA with OC San. The terms and conditions of a RCSA require the permittee to achieve compliance with all new standards by a specific date. RCSAs have a maximum term of two hundred seventy (270) days.

The issuance of a RCSA may contain terms and conditions including but not limited to, requirements for installation of pretreatment equipment and facilities, submittal of drawings or reports, waste minimization practices, or other provisions to ensure compliance with OC San's Ordinance. While the RCSA is in effect, any discharge by the permittee in violation of the RCSA will require payment of noncompliance sampling fees in accordance with Article 6 of OC San's Ordinance.

During FY 2021/22 OC San did not issue any **regulatory compliance schedule agreements.**

4.6.9 Administrative Complaints, Penalties, and Settlement Agreements

Pursuant to the authority of California Government Code Section 54740.5, OC San may issue administrative complaints and penalties against the responsible officer or owner of any company that violates any permit condition or effluent limit. In accordance with an OC San Board of Directors Resolution, OC San may also negotiate a settlement agreement in lieu of an administrative complaint, which includes corrective actions on the part of the industry and reduced administrative penalties.

During FY 2021/22, OC San **issued 1 administrative penalty in the form of settlement agreements.**

4.6.10 Permit Suspensions

When OC San believes that grounds exist for permit suspension, the permittee is notified in writing of the reasons for permit suspension and the date of the permit suspension hearing. At the hearing, OC San staff and the permittee are provided the opportunity to present evidence to a designated hearing officer. After the conclusion of the hearing, a written determination is made by the hearing officer. Upon issuance of a suspension order, the permittee must cease all discharges to the sewer for the duration of the suspension.

During FY 2021/22, OC San **did not issue any permit suspensions.**

4.6.11 Permit Revocations

The last recourse in the chain of administrative enforcement provisions is permit revocation. A permittee with a critical noncompliance record or who has failed to pay fees and charges is notified in writing of the reasons for permit revocation and the date of the permit revocation hearing. At the hearing OC San staff and the permittee are provided the opportunity to present evidence to a designated hearing officer. After the conclusion of the hearing, the hearing officer makes a determination if permit revocation is warranted and provides a written report to the General Manager for final determination. Should the General Manager

determine that the noncompliance record is substantial, revocation of the industrial waste discharge permit and loss of sewer discharge privileges may result.

During FY 2021/22 OC San **did not issue any permit revocations.**

4.6.12 Emergency Suspension Order

Pursuant to Section 614 of OC San's Wastewater Discharge Regulations, an Emergency Suspension Order may be ordered to stop an actual or impending discharge which presents or may present an imminent or substantial endangerment to the health and welfare of persons, or to the environment, or may cause interference to OC San's sewerage facilities, or may cause OC San to violate any state or federal law or regulation.

During FY 2021/22, OC San **did not issue any emergency suspension orders.**

4.6.13 Civil/Criminal Complaints

When a permittee intentionally or negligently violates any provision of the Ordinance, permit conditions, or discharge limits, OC San may petition to the Superior Court for the issuance of a preliminary or permanent restraining order. In addition, OC San can petition the court to impose, assess, and recover civil penalties for each day that violation occurs or seek criminal penalties for illegal disposal in accordance with OC San's Ordinance.

During FY 2021/22, OC San **did not file any civil or criminal complaints.**

4.7 Enforcement Summary

This section summarizes various enforcement actions conducted for in FY 2021/22 reporting year. Potential enforcement actions include but are not limited to compliance inspections, compliance meetings, probation orders, enforcement compliance schedule agreements, regulatory compliance schedule agreements, orders to cease, permit suspensions, and permit revocations.

Advance-Tech Plating, Inc. (Permit No. 1-021389)

Advance-Tech Plating, Inc. (ATP) is a job shop metal finishing facility. The facility performs anodizing and passivation on steel, aluminum, and some copper/brass parts. Operations at ATP start with precleaning and etching, then deoxidizing with muriatic acid and anodizing with sulfuric acid, followed by chem filming and dye coloring per customer specification. To protect the dyed surface, the parts are dipped in a clear anoseal followed by final rinsing and drying. Most of the wastewater is generated from the rinsing operations. ATP operates a continuous and a batch pretreatment system which consists of chrome reduction, pH adjustment, flocculation, metal precipitation and clarification. ATP utilizes a filter press for sludge dewatering.

As a result of multiple pH and heavy metals violations in 2019, ATP identified malfunctioning equipment and addressed compliance deficiencies with the installation of additional pretreatment equipment.

July 1 – December 31, 2021

On August 31, 2021, ATP submitted an O&M manual, pretreatment system layout and process flow drawings, manufacturing process drawings, and waste characterization information. On September 21, 2021, ATP had instantaneous chromium and zinc violations, and on September 22, 2021, ATP had a daily average zinc violation. An NOV was issued on October 14, 2021. On October 11, 2021, ATP submitted an SLCP. On November 4, 2021, OC San conducted a compliance inspection. At the time of inspection, ATP attributed the violations to improper management of the pretreatment system; however, a corrective action was not determined. On November 15, 2021, OC San issued a compliance requirement letter that directed ATP to determine a source of the violations, institute corrective actions, and submit a related summary report.

January 1 – June 30, 2022

On January 6, 2022, ATP submitted a corrective action report, which confirmed the violations from September 2021 were a result of improper management of the pretreatment system. The facility reported that a lift station valve was left open which allowed wastewater to discharge to the continuous treatment train and sewer while treatment equipment was offline. The facility indicated sludge accumulated in the clarifier and caused solids to carry over to the sample point. For corrective actions, the facility proposed to maintain daily use of the filter press to mitigate sludge accumulation and to implement a log to document pretreatment activity including equipment operating parameters and valve orientation. On April 13, 2022, ATP had a daily average zinc violation, for which an NOV was issued on May 3, 2022. On June 9, 2022, ATP had an instantaneous violation for zinc, and daily average violations for chromium and zinc. An NOV was issued on June 28, 2022. On June 23, 2022, OC San conducted a compliance inspection. At the time of inspection, ATP reported personnel did not maintain pH probe calibration, which likely resulted in improper treatment. In the month of June 2022, ATP had a zinc monthly exceedance, for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and continue to monitor ATP's discharge and compliance status on a quarterly basis.

Air Industries Company, A PCC Company (Knott) (Permit No. 1-531404)

Air Industries Company, A PCC Company (Knott) (AIC-Knott) manufactures titanium and stainless steel fasteners (rivets, screws, bolts, nuts) for the aviation and aerospace industries. Wastewater is generated from the following operations: alkaline cleaning, etching, passivation, pickling, chemfilm, cadmium and nickel electroplating, and molten salt deoxidation of titanium parts. Rinse water from metal surface finishing is segregated and treated through a continuous pretreatment system. Pretreatment system consists of chrome reduction, hydroxide precipitation, coagulation and flocculation, clarification, and sludge dewatering. Cyanide-bearing wastewater is directed through an ion exchange system and is recycled back to the process. Mop water and oily wastewater are segregated into totes and wastehauled offsite for disposal.

July 1 – December 31, 2021

On October 13, 2021, AIC-Knott had a chromium violation for which an NOV was issued on November 23, 2021. AIC-Knott provided a root cause analysis and a corrective action report via email on December 15, 2021, that attributed the cause of the violation to a failure in their recirculation pump for their chromium waste stream, which led to improper treatment. AIC-Knott had replaced the pump with air-diaphragm pumps as they have in-house capability to repair the equipment if it fails. Subsequent sampling showed compliance with AIC-Knott's chromium limits.

January 1 – June 30, 2022

On January 6, 2022, OC San issued an NOV for the October 2021 chromium and fluoride monthly limit exceedances. On January 10, 2022, OC San conducted a compliance inspection to review the corrective action that was implemented. AIC-Knott attributed the fluoride violation to improper batch treatment by their night shift operators and has since retrained them. OC San also noted that there are no set protocols for the treatment for the fluoride batch tank, which could lead to inconsistent treatment. AIC Knott will also implement logs to document key information prior to routing the treated batch for final discharge.

OC San will continue to monitor AIC Knott's discharge and compliance status on a quarterly basis.

Alex C. Fergusson, LLC, A Zep Company (Permit No. 1-601167)

Alex C. Fergusson manufactures liquid and powder soaps and detergents for industrial application. Wastewater generated from equipment washdown is collected in a centralized sump equipped with a submersible pump that discharges to sewer by float activation. The centralized collection sump serves as the designated sample point.

July 1 – December 31, 2021

During a routine inspection on July 27, 2021, Alex C. Fergusson stated that pH in the sample point is manually adjusted. OC San staff determined the reported practice was inadequate to maintain long-term compliance with permit limits and to prevent slug discharge of concentrated waste. OC San also noted the potential for the collection of stormwater and subsequent discharge to the sewer. On November 9, 2021, OC San issued a compliance requirement letter that required Alex C. Fergusson to submit a proposal to 1) install an automated batch treatment system equipped with automatic chemical feeds, mixers, shutoff valves, and a continuous pH chart recorder, 2) update related facility figures, and 3) prevent stormwater and surface runoff inflow to the sewer system. On December 8, 2021, it was reported that Alex C. Fergusson was planning on ceasing operations at the current location and relocating by February 2022. On December 16, 2021, Alex C. Fergusson submitted an interim compliance plan that addressed items outlined in the compliance requirement letter dated November 9, 2021.

January 1 – June 30, 2022

Alex C. Fergusson closed their business and ceased wastewater discharged to OC San's sewer in January 2022. Therefore, no further enforcement action will be pursued.

All Metals Processing of O.C., Inc. (Permit No. 1-031110)

All Metals Processing of O.C., Inc. (All Metals) performs plating and anodizing for military, aerospace, commercial and medical applications. Wastewater generated from rinse tanks is segregated by constituent composition. Cyanide- and chrome-bearing rinses are treated separately prior to convergence with the remaining wastewater. Treatment consists of chromium reduction, cyanide destruction, heavy metal precipitation, and solids settling and clarification. Collected sludge is processed through a filter press. Filtrate is returned for treatment and filter cake is hauled for offsite disposal. Concentrated solutions are batch treated.

July 1 – December 31, 2021

During a routine inspection on July 27, 2021, OC San noted wastewater from non-destructive testing bypassed the compliance sample point. On October 7, 2021, OC San issued a compliance requirement letter that required All Metals to submit proposals to measure the volume of wastewater discharged from non-destructive testing and reroute the discharge of this wastewater such that the sample point is representative of all regulated wastestreams generated and discharged to the sewer at the facility.

On December 2, 2021, All Metals submitted information concerning non-destructive testing; however, the submittal was incomplete as it did not address the items outlined in the compliance requirement letter dated October 7, 2021. On December 22, 2021, All Metals requested and was granted an extension to submit proposals by February 15, 2022. The deadline for installation and integration will be updated upon receipt and review of the proposals.

January 1 – June 30, 2022

On February 11, 2022, All Metals submitted proposals to install a process flow meter to measure discharge from non-destructive testing and to reroute discharge from non-destructive testing to the pretreatment system. OC San accepted All Metals' proposals on March 10, 2022, and All Metals implemented the proposals on June 24, 2022.

OC San will continue to monitor All Metals' discharge and compliance status on a quarterly basis.

Alloy Die Casting Co. dba ADC Aerospace (Permit No. 1-531437)

Alloy Die Casting, Co. dba ADC Aerospace (ADC) is a non-ferrous metal former that manufactures diecast parts to customer's specifications from aluminum and zinc alloys. Molten metal is injected into a steel die cavity at a controlled temperature under high pressure. Once the metal part is cooled and has reached sufficient rigidity, the mold opens up and the part is ejected. After casting, the part will undergo manual pneumatic grinding or belt sanding, followed by wet deburring to clean, de-flash, and/or provide a surface finish. Alloy Die uses two batch treatment systems, both of which perform pH adjustment and metals

removal through flocculation, while one performs oil & grease removal as well. The treated metal-bearing wastestream passes through a filter press, from which the filtrate is discharged to the sewer. The oil & grease wastestream is sent through an oil/water separator, from which the separated water is sent to the other batch treatment tank, and the separated oil & grease is wastehailed.

As a result of multiple zinc violations in 2020, ADC attributed the noncompliance to increased production and consequently instituted additional zinc testing to confirm compliance prior to discharge to the sewer. In May 2021, ADC exceeded the monthly average discharge limit for zinc.

July 1 – December 31, 2021

On August 3, 2021, OC San issued an NOV for the May 2021 zinc monthly average discharge limit exceedance. On August 26, 2021, ADC had a zinc violation, for which an NOV was issued on September 16, 2021. The August 26, 2021 result for zinc also caused an exceedance of the zinc monthly average discharge limit, for which an NOV was issued on November 2, 2021. On October 14, 2021, ADC had an additional zinc violation, for which an NOV was issued on November 2, 2021. The October 14, 2021 zinc violation also caused an exceedance of the zinc monthly average discharge limit, for which an NOV will be issued in the following reporting period. In December 2021, ADC also exceeded the monthly average discharge limit for zinc, for which an NOV will be issued in the following reporting period. ADC noted that residual zinc solids not filtered through the two filter presses may be passed to the final effluent holding tank and sent to the designated sample point. ADC will propose an additional solids removal and filtration system downstream of the filter presses and upstream of the effluent holding tank to remove these residual zinc solids which may not be captured by the filter press.

January 1 – June 30, 2022

On March 3, 2022, OC San issued an NOV for the December 2021 zinc monthly average discharge limit exceedance. Additionally, on March 17, 2022, OC San Issued an NOV for the October 2021 zinc monthly average limit exceedance.

ADC has indicated that they continue to prepare a proposal to filter residual zinc solids not captured by the filter press but has reduced the volume of wastewater discharged each batch allowing for more control in wastewater volume and concentration.

OC San will continue enforcement during the next reporting period and will continue to monitor ADC's discharge and compliance status on a quarterly basis.

Alloy Tech Electropolishing, Inc. (Permit No. 1-011036)

Alloy Tech Electropolishing, Inc (Alloy Tech) is an electropolishing job shop. Workpieces consist of cast, stamped, or machined parts. Fabricated assemblies are electropolished by manual rack techniques in six process tanks (100 to 2,000 gallons). Two tube processing stations handle tubing components too long for the process tanks. The processing of a typical part begins with metal preparation (alkaline cleaning, caustic cleaning, or nitric pickling to remove oxides and discoloration) followed by either passivation or electropolishing in a phosphoric/sulfuric acid solution. Passivation processes also may include nitric, dichromate, and citric acid. The company also provides precision cleaning in the onsite Class 100 cleanroom. After ultrasonic alkaline cleaning, the parts are rinsed with ultra-pure RO/DI water, dried in the HEPA-filtered environment, purged with high-purity nitrogen, packaged, and sealed.

Wastewater generated at Alloy Tech comprises of the spent alkaline cleaners, the associated rinse wastestreams, and the reject from the RO system. The RO reject is plumbed to a floor drain and does not pass through the sample point. Alloy Tech employs hydroxide chemical precipitation followed by filter press to treat wastestreams generated at the facility.

July 1 – December 31, 2021

On July 13, 2021, and November 5, 2021, Alloy Tech had daily average and instantaneous molybdenum violations for which NOVs were issued on August 3, 2021, and November 30, 2021, respectively. On September 30, 2021, and December 16, 2021, OC San conducted compliance inspections at Alloy Tech to

investigate the root cause of the molybdenum violations detected in the facility's wastewater discharge. Alloy Tech has been unable to determine the root cause of the molybdenum violations and has reported that the steel alloy and the chemicals used for passivation and electropolishing do not contain molybdenum. Specifically, per communication between the steel alloy supplier and Alloy Tech, the supplier has indicated that the steel alloy has negligible levels of molybdenum. Alloy Tech has also reported that a substantial portion of the rinses use tap water, which according to Alloy Tech has molybdenum levels as high as 1 mg/L.

On October 6, 2021, OC San issued a compliance requirement letter, requiring Alloy Tech to: 1) submit a corrective action report to OC San by October 31, 2021; 2) submit a pollutant identification report to OC San by November 30, 2021; 3) and submit a proposal to OC San for pretreatment system modifications to maintain long term compliance by November 30, 2021. Alloy Tech failed to submit the required documentation to OC San by October 31, 2021.

January 1 – June 30, 2022

On January 27, 2022, OC San issued a compliance letter requiring Alloy Tech to attend a compliance meeting to discuss the company failure to submit all requirements listed in the compliance letter issued on October 06, 2021. On February 17, 2022, a compliance meeting was held between OC San and Alloy Tech to discuss the status of the requirements issued by OC San to Alloy Tech in the compliance letter aforementioned.

During the compliance meeting, OC San reiterated that the facility had failed to submit the requirements listed in the compliance letter, namely: 1) a corrective action report; 2) a pollutant source identification report; and 3) a proposal to implement any and all steps and measures to attain long-term compliance. Alloy Tech's consultant reported that the company was planning to conduct bench tests using zero valent iron (ZVI) to enhance precipitation and removal of molybdenum from wastewater. OC San recommended evaluating other treatment alternatives to remove molybdenum from the facility's industrial wastewater in case the use of ZVI does not prove to be effective. OC San directed Alloy Tech to submit a proposal to OC San for review and acceptance.

On March 2, 2022, OC San issued a post-compliance meeting letter, which summarized the meeting discussion and required Alloy Tech to (a) submit a corrective action letter by March 15, 2022, identifying the root cause of the molybdenum violations; (b) develop a pollutant source identification report which qualitatively identifies and quantitatively characterizes each wastewater source at the facility and submit by March 31, 2022; (c) submit a proposal to accomplish long-term compliance by March 31, 2022, and implement the proposal by June 15, 2022 after OC San's acceptance; (d) maintain waste-haul logs; and (e) submit a copy of the spent solution waste manifests by March 15, 2022.

OC San will continue enforcement during the next reporting period and continue to monitor Alloy Tech's discharge and compliance status on a quarterly basis.

Amerimax Building Products, Inc. (Permit No. 1-021102)

Amerimax coats large rolls of aluminum sheet material. The coils are precleaned with alkaline solution prior to conversion coating, painting, curing, and quenching. Wastewater generated from alkaline precleaning and quenching routes to a three-stage clarifier and discharges to the sample point and to sewer.

July 1 – December 31, 2021

On July 8, 2021, Amerimax had cyanide violations for which NOVs were issued on October 28, 2021, and November 2, 2021, for monthly mass and daily mass limits violations, respectively. OC San conducted a compliance inspection on November 18, 2021. At the time of inspection, Amerimax was unable to identify the source for the violations and a corrective action was not determined. On November 24, 2021, OC San issued a compliance requirement letter that directed Amerimax to further review the violations, institute corrective actions, and submit a related summary report.

January 1 – June 30, 2022

On May 10, 2022, OC San issued a compliance status update concerning the NOV's issued on October 28 and November 2, 2021. OC San determined the method type for cyanide samples collected during the sample event on July 8, 2021 was not representative of flow for the respective 24-hour period, and thereby rescinded the cyanide violations.

OC San will continue to monitor Amerimax's discharge and compliance status on a quarterly basis.

Andres Technical Plating (Permit No. 1-521798)

Andres Technical Plating (Andres) is a job shop and performs soap cleaning, alkaline cleaning, acid cleaning, and electroplating of nickel, copper, chromium bathroom fixtures and small automobile parts.

The pretreatment area is divided into treatment for two segregated wastestreams, zinc- and nickel-bearing wastewater and copper- and chrome-bearing wastewater. Batch treatment is conducted on both streams 2-3 times a week or as needed. Both waste streams flow into a pair of separate batch tanks for treatment. Nickel and zinc wastewater undergoes typical metals hydroxide precipitation, while copper and chrome undergo chrome reduction with ORP and sodium metabisulfite. Following chrome reduction, wastewater is diverted to nickel and zinc treatment for complete metals treatment. Solids are pumped to the sludge holding tank and then to the filter press, while supernatant clear water is pumped to WW Tank 6 for holding prior to discharge.

July 1 – December 31, 2021

On July 1, 2021, OC San issued an NOV for the nickel monthly exceedance from April 2021. On July 13, 2021, OC San issued a compliance requirement letter, requiring Andres to submit a corrective action report and multiple proposals to address the pretreatment system deficiencies at the facility. On August 31, 2021, Andres submitted the pretreatment system proposal to OC San, for which feedback was provided on September 7, 2021. On September 10, 2021, Andres had nickel and chromium daily limit exceedances, for which an NOV was issued on September 30, 2021. On October 14, 2021, OC San conducted a compliance inspection at Andres. During the compliance inspection, Andres attributed the chromium and nickel violations to excessive solids accumulation in the effluent wastewater holding tank (TWW #6). OC San added that the root cause could also be associated with inefficient waste minimization procedures in the production area since all rinsing processes are static. Andres reported that an assessment of waste minimization procedures had been initiated and will be implemented once an evaluation of the production processes is completed.

On November 4, 2021, OC San issued a compliance requirement letter to Andres directing the facility to attend a compliance meeting with OC San due to on-going issues at the facility and a failure to implement pretreatment proposal by the required date. On December 1, 2021, OC San held a compliance meeting with Andres to verify the status of the requirements listed in the compliance requirement letters issued to date to the facility. On December 2, 2021, OC San issued an NOV for the September 2021 for the chromium and nickel monthly limit exceedances.

January 1 – June 30, 2022

On March 1, 2022, OC San issued a compliance requirement letter, summarizing the compliance meeting and detailing a number of compliance requirements that Andres failed to complete, including: 1) implement the proposal to hard plumb all zinc- and nickel-bearing rinse wastestreams and copper- and chromium-bearing rinse wastestreams to the appropriate treatment system; 2) maintain a qualified industrial wastewater treatment operator onsite at all times at which wastewater is being processed at the facility; and 3) submit an updated wastewater characterization of all wastestreams generated at the facility. OC San also provided further clarification around the compliance requirements and granted an extension for the completion of all missing requirements. On May 6, 2022, Andres submitted all documents required in the post-compliance meeting letter for OC San review, except the certification of a qualified industrial wastewater treatment operator.

OC San will continue enforcement during the next reporting period and continue to monitor Andres' discharge and compliance status on a quarterly basis.

AnoChem Coatings (Permit No. 1-600295)

AnoChem Coatings (AnoChem) is a job shop, which include anodizing, chemical etching, and coating operations. AnoChem Coatings primarily performs Type II anodizing of customer-supplied aluminum parts. Parts are used in all industries, including automotive, aerospace, and medical. Aluminum parts received from the customers are cleaned in an alkaline detergent, subject to deoxidizing, and then anodized clear or dyed a color, followed by a nickel seal. Colored tanks include black, blue, red, gold, and maybe combined for several others. Cleaned aluminum parts may also be chem-filmed only and readied for corrosive resistant painting by third parties. Anochem also conducts passivation on stainless steel with nitric and citric acids.

Wastewater-generating operations include alkaline cleaning, deoxidizing, etching, chem-film, anodizing, dyeing, nickel sealing, and associated rinses. The wastewater undergoes continuous pH adjustment in the two-stage treatment tank prior to discharge to the sewer. Rinse water with potential for hexavalent chrome from chem-film operations is closed loop and recycled through ion exchange tanks with resin regenerated off-site.

July 1 – December 31, 2021

On September 9, 2021, Anochem had a daily average nickel violation for which an NOV was issued on September 30, 2021. On December 2, 2021, an NOV was issued for the monthly average limit exceedance from September 2021.

On October 19, 2021, OC San conducted a compliance inspection at AnoChem to investigate the cause of the nickel violation. During the inspection, AnoChem informed OC San that the facility was testing two new process tanks (hard anodize and associated rinse) recently added to the manufacturing process. The self-monitoring reports show that on the day of the nickel violation, the discharge volume was 7,600 gallons, which is higher than the facility average discharges of 3,500 gallons per day (GPD) and the flow base of 5,000 GPD. As a result, a mass discharge violation occurred.

On October 27, 2021, OC San issued a compliance requirement letter requiring AnoChem to submit: 1) a corrective action report, 2) a proposal for the production process modifications and expected changes to the wastewater characteristics, 3) revised facility drawings reflecting the changes recently made onsite and 4) a pollutant source identification report. On November 2, 2021, AnoChem submitted a corrective action report and a proposal for the production process modifications, which is currently under OC San review and evaluation.

January 1 – June 30, 2022

OC San continued to review AnoChem's proposal during this reporting period. OC San will continue to monitor Anochem's discharge and compliance status on a quarterly basis.

Anomil Ent. Dba Danco Metal Surfacing (Permit No. 1-011155)

Anomil Ent. Dba Danco Metal Surfacing (Danco) performs dry and wet surface finishing on customer-supplied parts made of aluminum and stainless steel. Parts are primarily used in aerospace, automotive, commercial, consumer, industrial, medical, military/defense, and recreational applications. Danco is classified as a job shop as they provide a service to industry and own less than 50% of the parts. Daily production is dependent on jobs and specifications and may vary day to day.

The facility specializes in the following wet operations: anodizing, caustic etch, deoxidation, chem-film, color dyeing, finishing (ARP for frost finish or ammonium bifluoride for dull finish), sealant (nickel acetate or hot D.I.), alkaline cleaning, and passivation (stainless steel parts). All wet operations are conducted manually using basket, rack, or wire process techniques. Solvent (acetone) based demasking occasionally concludes the process operations. Supporting dry operations without wastewater include polishing, surface masking (dry or lacquer), buffing, hole plugging, line graining, and glass bead blasting.

Waste/wastewater generating operation(s) include alkaline cleaner, ammonium bifluoride, anodize Type II, anodize Type III, aqueous fume scrubber, ARP (2 tanks), black dye, blue dye, brown dye, caustic etch, chem film, chem film – hexavalent chrome-free, countercurrent rinse, deoxidizer, gold dye, grey dye, hot D.I. rinse, hot D.I. seal, nickel acetate seal, nitric acid, red dye, running rinse, spray rinse, teflon seal, turquoise dye, violet dye, and yellow dye. Scrubber bleed also flows to the treatment. Wastewater is processed through ion exchange for chrome removal, hydroxide precipitation, clarification tanks, and pH neutralization.

January 1 – June 30, 2022

On May 4, 2021, Danco had an instantaneous copper violation for which an NOV was issued on May 17, 2021.

On June 8, 2021, OC San conducted a compliance inspection at Danco to investigate the cause of the copper violation. Danco provided a corrective action letter noting that the root cause of the violation was due to a batch discharge from treating spent Type 2 anodizing solution. Danco noted that the anodizing tank has copper rods which are used to hold racks and are cleaned periodically, and sludge cleaning processed in the batch tank may have caused elevated copper levels. Danco also noted there was a tear in one of the filters within their filter press which is used for batch treatment and solids removal, but Danco has repaired the filter press since then. OC San staff noted that batch discharge logs from May 4, 2022, showed that an R&D tank was treated and discharged. Danco was unsure of the contents of the R&D tank as the contents are typically proprietary. The previous discharge of a batch from Type 2 anodize solution was from a week prior to May 4, 2022. Danco indicated that the Operators were not properly allowing parts to drag out the solution back into the process tanks, which may have impacted the continuous treatment system and have been re-trained. Danco also provided batch treatment procedures as a follow up.

OC San will continue enforcement during the next reporting period and continue to monitor Danco's discharge and compliance status on a quarterly basis.

APCT Orange County (Permit No. 1-600503)

APCT Orange County (APCT OC) specializes in prototype, quick turn and semi-production orders. The manufacturing operations begin by generating film photo-tools. Production of the typical multilayer board begins by cutting the copper clad and pre-preg materials, photoresist application, inner-layer circuit imaging, photoresist developing, ammonium etching, alkaline resist stripping, and automatic optical inspection (AOI). This is followed by surface preparation, lamination, and drilling. Outer-layer circuit development proceeds by either panel-plate or pattern-plate process steps. Panel-plate boards undergo copper plating followed by photoresist application, circuit imaging, photoresist developing, and ammonium etching. Pattern-plate boards undergo photoresist application, circuit imaging, resist developing, and copper plating. The pattern-plate boards are then sent offsite for tin/lead plating and brought back onsite for ammonium etching and tin resist stripping. After resist stripping, the boards undergo a second AOI inspection, followed by solder mask application. The boards are again sent offsite for final surface finishing such as hot air solder leveling and/or nickel/gold plating. Upon return, the boards receive legend screening, a final visual inspection, routing, and electrical testing. APCT OC employs ion exchange, batch treatment and pH adjustment to treat all wastewater generated prior to discharge to the sewer.

January 1 – June 30, 2022

On February 2, 2022, APCT had a daily average nickel violation for which a NOV was issued on February 24, 2022. On March 10, 2022, OC San conducted a compliance inspection at APCT to investigate the root cause of the nickel violation. During the inspection, APCT stated that they had not been able to determine the source and cause of the nickel violation, but indicated operator error was a possibility. APCT also reported that the nickel plating bath wastewater was accidentally transferred to the electroless copper rinse holding tanks (WT-T1 and/or WT-T2), which are routed to treatment that does not include nickel removal.

APCT used a flex hose and a portable pump to transfer nickel plating bath wastestreams to 55-gallon drums, which were transported either with a dolly or a forklift to the pretreatment processes area, where the contents of the drums is then pumped into the batch treatment tank (BT-T1). OC San explained that

flex hose and mobile transport of drums is not an acceptable method to convey/transfer wastewater at the facility because of the potential of cross contamination and noncompliance issues. APCT has been waste-hauling the nickel plating bath wastestream offsite and evaluating the feasibility of hard plumbing this wastestream to the batch treatment.

On May 3, 2022, OC San issued an NOV for the February 2022 monthly nickel limit exceedance. On May 4, 2022, OC San issued a compliance letter required APCT to: 1) submit corrective action report; 2) maintain a log of the dates that the nickel plating bath wastestream is wastehailed offsite and the respective waste manifests and 3) facilitate a waste management training focused on the facility's waste segregation and disposal procedures.

OC San will continue enforcement during the next reporting period and continue to monitor APCT's discharge and compliance status on a quarterly basis. In addition, OC San will also review the nickel plating waste manifests.

ARO Service (Permit No. 1-021192)

ARO Service (ARO) performs repair and refurbishment of aluminum aircraft skins and wing components for the aviation industry. Operation at ARO includes chemical surface treatment. The conversion coating line at ARO consists of alkaline cleaning followed by a series of phosphoric acid/deoxidizer treatment and conversion coating and associated deionized water spray rinses. Wastewater from the rinse tanks is collected in a batch tank where soda ash is added and mixed with an air sparger to obtain a pH of 7.0 or higher before discharge to the sewer.

July 1 – December 31, 2021

On December 13, 2021, ARO had copper, zinc, and pH violations that also resulted in a violation of the monthly limit for zinc. The NOVs will be issued during the next reporting period.

January 1 – June 30, 2022

On January 11, 2022, OC San issued an NOV for the copper, zinc and pH violations from the last reporting period. On March 3, 2022, OC San issued an NOV for the zinc monthly limit violation from December 2021. OC San conducted a compliance inspection on March 17, 2022. At the time of inspection, ARO attributed the pH violation to deficient retention prior to batch discharge; however, ARO was unable to readily identify the cause for the metals violations and a corrective action was not determined. OC San will continue enforcement during the next reporting period and continue to monitor ARO's discharge and compliance status on a quarterly basis.

OC San has drafted a compliance requirement letter to determine the source for the violations and to submit a corrective action summary report that will be issued during the next reporting period.

OC San will continue to monitor ARO's discharge and compliance status on a quarterly basis.

Arrowhead Products Corporation (Permit No. 1-031137)

Arrowhead Products Corporation (Arrowhead) manufactures air ducting systems, fuel manifolds, flexible metallic joints connectors, and complex fabricated components for aerospace applications. Wastewater generating operation(s) include abrasive jet machining, caustic dip, dye penetrant testing, general pickling, titanium pickling, alkaline cleaning, permanganate cleaning, pressure testing, Turco cleaning, and ultrasonic cleaning. Arrowhead operates a continuous pretreatment system, which consists of pH adjustment, chrome reduction, filtration, ion exchange, and clarification.

July 1 – December 31, 2021

On August 24, 2021, OC San received and accepted Arrowhead's request to extend requirement due dates for the RCSA. Arrowhead has requested that the due date for the installation of the accepted pretreatment system and hard/fixed plumbing be extended to December 31, 2021 and to extend the submittal due date of as-built drawings, O&M manual, and termination of the RCSA to January 2022.

January 1 – June 30, 2022

At the conclusion of the RCSA, on February 15, 2022, Arrowhead and OC San conducted a RCSA multi-sampling event that resulted in two fluoride daily average violations for which two NOVs were issued on March 15 and March 24, 2022. On March 29, 2022, OC San conducted a compliance inspection to investigate the root cause of the fluoride violation detected in the facility's wastewater discharge on February 15, 2022. During the inspection, Arrowhead could not readily identify the root cause of the fluoride violation. However, Arrowhead believed it could have been due to the fluoride resin regeneration process that was conducted on February 11, 2022. Arrowhead has observed an increase in fluoride concentrations after each regeneration procedure. OC San stated that fluoride breakthrough may be occurring for a few hours after the regenerated resin vessel is placed back in service and the treated water should be recycled or wastehauled to prevent violations of permit limits. Arrowhead confirmed that the regenerant waste has been wastehauled offsite.

On February 15 and April 28, 2022, Arrowhead had cyanide violations for which NOVs were issued on April 19 and June 28, 2022, respectively. On May 3, 2022, OC San issued an NOV for the February 2022 fluoride monthly limit exceedance. Arrowhead had a CN monthly limit violation for April 2022 for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and continue to monitor Arrowhead's discharge and compliance status on a quarterly basis.

Astech Engineered Products (1) (Permit No. 1-571295)

Astech Engineered Products (1) (Astech) manufactures jet engine housings and exhaust nozzles, thrust reverser components, navy ship doors, light weight high-strength, and heat resistant and noise suppression structures. Wastewater generating operations include acid etching, alkaline cleaning, acid pickling, wet scrubbing, Ransohoff cleaning, waterjet saw cutting, seam welding, panel welding, penetrant dye testing, and associated rinses. Astech utilizes a pH neutralization and three-stage clarification system for the rinses and scrubber overflow. The waterjet cutting wastestream undergoes aboveground solids settling followed by underground three-stage clarification prior to discharge to the sample point.

January 1 – June 30, 2022

On May 18, 2022, Astech had daily limit violations for chromium, copper, molybdenum, and pH for which an NOV was issued June 28, 2022. OC San conducted a compliance inspection on May 19, 2022, as a result of inspection staff noting that the facility had a slug discharge event of acidic solution on May 18, 2022, which was the cause of the violations noted above. A process tank used for pickling metals located in the processing area contains hydrofluoric acid (1-3%), nitric acid (21-28%), and water. The tank is used on honeycomb panels made of stainless steel and titanium. Astech stated that level control in the tank failed and began overflowing to secondary containment. Astech explained that there is a floor drain (that Astech was not aware of) located within secondary containment in this processing area. The floor drain is connected to a line that discharges to the 3 stage underground clarifier and then to the sewer, which bypassed the pH adjustment system that is used for rinses from this processing line. Astech estimated that approximately 20-25 gallons of concentrated waste from this tank was discharged through the floor drain. OC San was conducting 24 monitoring during the slug discharge event.

As an immediate corrective action, Astech identified a valve downstream of the floor drain noted above and closed it. Astech also disconnected the line connecting the floor drain to the clarifier and capped it, preventing any further discharge from this floor drain to the sewer. Astech also had all wastewater from the floor drain and the clarifier waste-hauled. Astech also contracted a plumber to video trace all the underground drain lines to verify routing and remove those floor drains that are not used. OC San stated that all floor drains should be removed and replaced with a hard pipe connection if needed for service (i.e. compressor condensate, etc.). OC San also recommended the use of a pH monitoring system at the same point with alarms and a chart recorder. It was noted that Astech failed to notify appropriate local agencies of the slug discharge event as required in the Slug Discharge Control Plan. OC San reminded Astech that the permittee is required to follow the Slug Discharge Control Plan, including the requirement to notify agencies of a slug discharge event. Going forward, OC San requested updates on a path forward and

proposals for any changes that Astech may plan to make to the facility, as a result of this event and at any time as required in the permit.

On June 1, 2022, a new permit (1-601719) was issued to Astech Engineered Products (2) as a result of change of ownership. While the enforcement ended with the previous permit, OC San will verify the compliance status of the new permittee and monitor Astech Engineered Product (2)'s discharge and compliance status on a quarterly basis.

Auto-Chlor System of Washington, Inc. (Permit No. 1-511384)

Auto-Chlor System of Washington, Inc. manufactures approximately 1,600 gallons of soaps and detergents a day through chemical blending operations. There are also packaging and distribution operations from bulk quantities to smaller containers. The company provides commercial dishwashing and laundering services throughout the United States.

Wastewater is generated from equipment, container, and blending vessel washing operations. Containers are brought back from serviced facilities and are cleaned as needed and refilled with the appropriate solution to be reused back in the field. Containers range in size up to 5-gallon buckets and have a patented cap to prevent contamination or use with other equipment. Raw materials arrive at the facility in drums, totes, or tankard, and are segregated based on incompatibles including bleach and acids. There is an 1,800-gallon chemical holding tank outside the warehouse in the parking lot on the east side of the facility, this is used for storage of bleach which is used in products. The company product list manufactured on-site includes soaps, detergents, descaler, and ammonia sanitizer. City water is used in blending operations, water is softened with a self-regenerating type of water softener, but no other treatment like RO or DI columns.

Auto-Chlor performs blending operations of raw materials in the below-grade secondary contained pit in the center of the production warehouse. There are four 450-gallon blending vessels/tanks and a 1,250-gallon blending vessel/tank. The same pit holds the 450-gallon batch wastewater treatment tank, and a spill containment sump directing any spills to batch treatment. The batch treatment has a manually operated discharge pump and ball valve to prevent any accidental releases to the sewer. Company only generates one or two batches of wastewater each month, wastewater is checked for chlorine and pH and adjusted as needed using citric acid and sodium bicarbonate. The pH must be between 7 and 9 prior to discharge, there is a detailed neutralization sheet and batch discharge log documenting each load. Sampling is conducted by grab at the batch tank just prior to discharge.

July 1 – December 31, 2021

On October 20, 2021, Auto-Chlor had a copper violation, for which an NOV was issued on November 16, 2021. On November 30, 2021, OC San conducted a compliance inspection at Auto-Chlor to investigate the cause of the recent copper violation. The company could not readily identify the root cause of the copper violation. OC San stated that the lack of copper in the chemicals used to manufacture the soaps and detergents may be an indication of cross-contamination in the facility processes. Auto-Chlor reported that on the day that OC San collected wastewater samples, the operator replaced a manual valve on one of the blending tanks. Auto-Chlor indicated that a copper pipe had to be cut in order to replace the valve, and that the feed water (hot tap water) is conveyed to the blending tanks via a copper pipe.

OC San will issue a compliance requirement letter during the next reporting period that will require Auto-Chlor to submit a corrective action report to OC San and submit analytical results for copper from samples of tap upstream and downstream of the heating system.

January 1 – June 30, 2022

On March 1, 2022, OC San issued a compliance requirement letter summarizing the findings of the compliance inspection and the requirements to mitigate the copper violation and maintain long-term compliance with discharge limits.

OC San will continue enforcement during the next reporting period and continue to monitor Auto-Chlor's discharge and compliance status on a quarterly basis.

Aviation Equipment Processing (Permit No. 1-071037)

Aviation Equipment Processing (AEP) manufactures, repairs, and assembles metal and composite structures for the aircraft and aerospace industries. Wet processes that generates wastewater includes alkaline cleaning, sulfuric dichromate etch, and a phosphoric anodizing line. Wastewater is pumped out from the process and rinse tanks to a 1,500-gallon batch holding tank. AEP conducts batch treatment which consists of pH adjustment, flocculation, and clarification followed by sludge dewatering with a filter press.

July 1 – December 31, 2021

On November 11, 2021, AEP had a cadmium daily limit violation, that also resulted in a monthly limit violation for Cadmium in the month of November. NOV's will be issued during the next reporting period.

January 1 – June 30, 2022

OC San issued an NOV for the November cadmium daily limit violation on January 20, 2022 and an NOV for the November monthly cadmium violation on February 3, 2022. AEP attributed the violation to solids accumulation in the air agitation piping that connects directly to the batch discharge tank. As part of AEP's corrective action, AEP installed a solids catcher in the air line to prevent solids from entering the batch discharge tank and switched out the galvanized piping to PVC piping. Resample showed compliant levels for cadmium. OC San conducted a compliance inspection on February 23, 2022 to review the implemented corrective action. During the inspection, AEP also mentioned that they will be purchasing test kits to use prior to discharge to ensure compliance. AEP had no further violations during this reporting period.

OC San will continue to monitor AEP's discharge and compliance status on a quarterly basis.

Avid Bioservices, Inc. (Permit No. 1-571332)

Avid Bioservices, Inc. (Avid) is a Contract Development Manufacturing Organization (CDMO) specializing in mammalian cell culture development and production of clinical and commercial monoclonal antibodies, recombinant proteins and enzymes. Liquid salt solutions and spent media are used throughout the process and are collected from the downstream purification area to be neutralized. Most solutions are 0.2um filtered during processing. Medium containing culture is disinfected prior to discharge to the sewer. Wastewater is also generated from the cleaning of the equipment used in the production operations and disinfected media culture. Avid has a pH adjustment system to treat the wastewater to compliant pH range.

July 1 – December 31, 2021

On December 16, 2021, Avid had an acetone violation, for which an NOV will be issued during the next reporting period. In December 2021, Avid had acetone and tetrahydrofuran monthly limit exceedances, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On January 27, 2022, OC San issued an NOV for the December 2021 acetone noncompliance. On February 15, 2022, Avid submitted a corrective action report attributing the violation to an accidental discharge of IPA to the wastewater system. Avid stated that the operator inadvertently did not read the label of the IPA waste bag, and after further investigation it was also discovered that the bag containing the IPA waste was not stored in a properly labeled drum with a hazardous waste label. Avid addressed the noncompliance issue by adding hazardous labeling instructions to their SOP, instituting new instruction for operators to notify supervisors or managers to visually verify the proper labeling and containment of IPA, and installation of a new hazardous waste storage shed located outside of the facility. Additionally, Avid removed acetone from their manufacturing process during December 2021.

On March 4 and 16, 2022, Avid had daily acetone limit violations for which two NOV's were issued on March 31, 2022. The daily limit exceedance also resulted in an acetone monthly average discharge limit violation, for which an NOV was issued on June 2, 2022. On May 4, 2022, OC San issued a compliance requirement letter requiring Avid to attend a compliance meeting to discuss the violations. On June 1, 2022, OC San held a compliance meeting with Avid during which they concluded that IPA converts to acetone in the vapor phase as a secondary source of acetone formation due to the chemical conversion of IPA to acetone from

its wastewater holding tank. During the meeting, Avid stated that IPA has been eliminated from the effluent waste stream. Avid also reported that to prevent further acetone non-compliance they had installed a new sample port on the waste effluent pipe and implemented daily sampling and analysis of acetone for informational purposes. On June 7, 2022, OC San issued a compliance requirement letter instructing Avid to conduct multi-day self-monitoring and submit by July 15, 2022. On June 22, 2022, OC San met with Avid representatives to review Avid's recent modification to SOPs and process changes at their facility. Avid's permit will be revised to increase the frequency of acetone monitoring from quarterly to monthly during the next reporting period.

OC San will continue to monitor Avid's discharge and compliance status during the next reporting period.

B. Braun Medical, Inc. (West/Lake) (Permit No. 1-541183)

B. Braun Medical, Inc. (West/Lake) (B. Braun West) manufactures pharmaceutical intravenous fluid and the packaging for the fluid. The manufacturing process includes mixing, filling, sterilization, and packaging of aqueous injectable and parenteral pharmaceutical products. The packages are sprayed and bath-sterilized before they are placed on pallets and collected for shipment. Waste from the sterilization process consists of condensate that accumulates on the packages during the cooling process, and the water drained weekly from the heat exchangers.

January 1 – June 30, 2022

On June 20, 2022, B. Braun Medical (West/Lake) had a pH violation. OC San will issue an NOV for the pH violation and conduct enforcement during the next reporting period.

Bazz Houston Co. (Permit No. 1-031010)

Bazz Houston Co. (Bazz) manufactures springs, stampings and various metal parts through machining and bending operations. Wastewater is primarily generated by deburring operations and is discharged into a partitioned tank via hosing and gravity flows as runoff over a concrete pad into a sump.

In January 2021, Bazz had an oil & grease violation. Bazz attributed the violation to incorrect sampling technique utilized by their contracted laboratory technician. A compliance inspection was conducted and OC San observed that the discharge was not hard-plumbed to the discharge point, where wastewater flows as runoff over a concrete pad into the sump. OC San issued a compliance requirement letter in May 2021 requiring Bazz to hard-plumb and reroute their piping configuration, install an accessible sample box lid, establish a maintenance schedule for their sump, and provide a detailed explanation as to why their re-sample is not representative of their discharge. Bazz submitted their proposal to address their compliance issues in June 2021.

July 1 – December 31, 2021

On August 31, 2021, OC San accepted Bazz's proposal to degrease all parts prior to deburring, install rigid piping to convey rinse water from the deburring machine directly to the sump, install an accessible sump lid, and maintain a weekly cleaning schedule of the sump. Bazz completed the implementation of these corrective actions by October 15, 2021. OC San conducted a compliance inspection on October 27, 2021 to verify the status of Bazz's implementation of their proposal.

January 1 – June 30, 2022

Bazz had no further violations during this reporting period. OC San will continue to monitor Bazz's discharge and compliance status on a quarterly basis.

Beo-Mag Plating (Permit No. 1-511370)

Beo-Mag Plating is small job shop specializing in decorative chrome and gold plating, restoration of motorcycle and classic automobile parts, bathroom fixtures and other assorted parts.

The processing of a steel or die-cast zinc part generally proceeds by polishing, electrocleaning, cyanide copper strike, acid copper plating, manual buffing, alkaline cleaning to remove the buffing residue, nickel

plating, and finally chrome plating. The chrome plating of a typical aluminum part proceeds by polishing, alkaline cleaning, Alumina acid etch, deoxidation, zincate, copper plating, buffing, alkaline cleaning to remove the buffing residue, nickel plating, and finally chrome plating. All wet operations are conducted manually using typical rack and wire plating techniques.

Wastestreams generated at Beo-Mag plating are treated using hydroxide precipitation, chrome reduction and cyanide destruction.

In June 2021, OC San conducted a compliance inspection at Beo-Mag to investigate the cause of the total cyanide violation detected in the facility's discharge in March 2021. During the compliance inspection, the company attributed the cyanide violation to an operator error. Beo-Mag stated that the operator may have pumped out wastewater from the chromium reduction batch treatment before the chemical precipitation was completed. Beo-Mag conducts batch treatment twice a month and operating parameters indicate that an optimum chemical precipitation occurs within two days. On March 25, 2021, the hydraulic retention time may have been insufficient to allow chemical reactions to be completed resulting in poor metals settling.

July 1 – December 31, 2021

On March 25, 2021, Beo-Mag had a total cyanide violation, for which an NOV was issued on July 1, 2021. OC San also issued an NOV on July 1, 2021 for an April 2021 cyanide monthly limit exceedance. On July 13, 2021, OC San issued a compliance requirement letter to Beo-Mag to submit a corrective action report for the last reporting period's cyanide violation by August 15, 2021. On August 15, 2021, Beo-Mag submitted a corrective action report confirming that it was an operator error.

On November 2, 2021, OC San issued an NOV for a cyanide monthly limit violation from August 2021. On November 2, 2021, OC San conducted a compliance inspection at Beo-Mag to investigate the cause of this total cyanide violation. During the compliance inspection, the company was unaware of the cyanide violation even though the violation was detected during the company's self-monitoring sampling. OC San reminded Beo-Mag of the discharge limits listed in the permit and of the importance of cross-checking discharge concentrations against the permit limits. OC San observed that Beo-Mag has proper instrumentation and controls to measure and achieve desired operational parameters; however, the company lacks sufficient documentation of regular calibration and maintenance of the pH meters and ORPs, which are essential for reliable operation and maintaining long-term compliance.

OC San also noted that the company lacks Standard Operating Procedures (SOPs) for the hydroxide precipitation, chrome reduction and cyanide destruction processes. Beo-Mag has a complex pretreatment system that has been operated and maintained without a set of written instructions that document routine procedures at the facility, minimizes inconsistencies, promotes quality, and supports compliance requirements. On November 24, 2021, OC San issued a compliance requirement letter requiring Beo-Mag to submit a correction action report and address the compliance deficiencies as noted. On November 16, 2021, Beo-Mag submitted a corrective action report and documented that pretreatment operator was not recording whether the pH and ORP sensors were calibrated and properly maintained.

January 1 – June 30, 2022

After review of the corrective action report submitted by Beo-Mag, it was determined that no further enforcement actions were required at this time. Beo-Mag had no violations during this reporting period.

OC San will continue to monitor Beo-Mag's discharge and compliance status on a quarterly basis.

Beverage Visions LLC (Anaheim) (Permit No. 1-601448)

Beverage Visions, LLC (Beverage Visions) blends raw ingredients with water to produce beverages. Wastewater generated from clean-in-place (CIP) and equipment rinses, steam sterilization, and boiler blowdown discharges to a three-stage clarifier, a final discharge compartment, then to sewer. The facility utilizes an automated pH adjustment system, which doses caustic and sulfuric acid to the clarifier's first stage.

January 1 – June 30, 2022

On June 23, 2022, OC San issued an NOV for pH violations that occurred during the composite sample event completed June 8, 2022.

OC San will continue enforcement during the next reporting period and continue to monitor Beverage Visions' discharge and compliance status on a quarterly basis.

Beverage Visions LLC (Yorba Linda) (Permit No. 1-601449)

Beverage Visions LLC (Beverage Visions) is a producer of beverages and dietary supplements. The company has proprietary recipes blending raw materials and ingredients into products which are bottled and packaged. Approximately 20,000 gallons of product are generated on-site each day. The facility has a large process room for blending and homogenizing in steel vessels and mix tanks. Vessels and tanks are transferred to the filling lines for processing of up to 400 bottles/minute per line. There are also shipping and storage areas, as well as a QA lab.

Wastewater is generated from cleaning and sanitation operations of all tanks, equipment, and rooms involved in production operations. There are also bottle rinsing and sanitizing operations, and a packaging floor steam tunnel with condensate. Beverage Visions also has a Zamboni cleaning machine for maintaining floors. Wastewater pH is neutralized with a caustic drip system designed to elevate pH of wastewater discharge. There is an underground three-stage clarifier with sample box on the outside east end of the building in the parking lot, which occasionally causes sampling issues due to parked cars.

Raw materials used as ingredients at the facility include juice, natural and artificial flavorings, salt, sugars, sweeteners, citric acid, ascorbic acid, syrups, extracts, potassium sorbate, sodium benzoate, vitamins, and seasonings. Other chemicals used on site include acetic acid and caustic used in Cleaning in Place (CIP) operations and all other cleaning and sanitation operations. Polymer and biocide are also used for the boiler and cooling tower.

July 1 – December 31, 2021

A pH violation was detected during an OC San monitoring event on December 7, 2021, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On December 7, 2021, Beverage Visions had a maximum pH violation for which a NOV was issued on January 11, 2022. On February 1, 2022, OC San conducted a compliance inspection at Beverage Visions to investigate the cause of the pH violation.

At the time of this inspection, Beverage Visions reported that the cause of the pH violation was twofold: 1) insufficient hydraulic capacity of the metering pumps of the chemical feed system to meet the discharge demands and 2) the sulfuric acid storage tanks were probably empty leading to a failure of pH adjustment of the wastewater prior to discharge to OC San. In December 2021, Beverage Visions replaced the existing metering pumps with pumps of higher hydraulic capacity. Since wastewater discharge flows can be as high as 98,000 gallons per day (GPD), the existing chemical dosage system is inadequate and upgrading the pumps alone is not sufficient to prevent future pH violations and maintain long-term compliance. OC San suggested that a long-term solution involving flow equalization to properly adjust pH may be warranted. OC San and Beverage Visions also discussed pH calibration and pH probe maintenance procedures. OC San suggested instituting weekly pH calibration checks and replacing the existing pH probes with probes that are appropriate for the service in which they are used (e.g., resistant to the chemistry of the wastewater after chemical addition). On March 2, 2022, OC San issued a compliance requirement letter summarizing the findings of the compliance inspections and the requirements to correct the pH issues at the facility and maintain long-term compliance with the permitted discharge limits.

On April 14, 2022, Beverage Visions submitted a proposal for the installation of an automatic pH monitoring and adjustment system for OC San's review and acceptance. OC San is currently reviewing the proposal and will continue enforcement during the next reporting period.

OC San will continue to monitor Beverage Visions' discharge and compliance status on a quarterly basis.

Brasstech, Inc. (Permit No. 1-600316)

Brasstech, Inc. (Brasstech) operations consist of electroplating, coating, and chemical etching. Ancillary operations include scrubber bleed, cleaning, and laboratory testing. Dry operations include vapor plating under vacuum, miscellaneous machining operations, brazing/welding, and painting operations.

There are three process lines for electroplating with non-precious metals including nickel and trivalent chrome, oxide, and stripping for reworked parts. Brasstech uses trivalent chromium, but no hexavalent chromium is kept onsite. Products are all brass based alloys, where copper and zinc ratios are adjusted for hardness. Other metals may be combined to adjust for machinability, corrosion, or other physical and chemical properties; these metals include aluminum, lead, and arsenic. Brasstech utilizes a variety of methods to generate over 25 different finishes on their parts, and carries over 200 design and utility patents.

Wastewater treatment has segregated wastestreams for chrome, nickel, and batch lines. Rinse water is recycled where possible through cation and anion exchange tanks, while ion exchange regenerant is batch treated and discharged. Treatment includes wastestream equalization, hydroxide precipitation, flocculation, thickening, filter press, and pH adjustment; each batch is jar tested, checked for compliance, and logged prior to discharge. There are several conductivity, pH, and ORP meters for use with the programmable logic controller.

January 1 – June 30, 2022

On January 11, 2022, Brasstech had instantaneous and daily average molybdenum violations for which an NOV was issued on January 27, 2022. On February 24, 2022, OC San conducted a compliance inspection at Brasstech to investigate the root cause of the molybdenum violations. During the compliance inspection, Brasstech attributed the molybdenum violation to the dragout rinse tank immediately downstream of the black oxide tank. Typically, the dragout rinse is pumped to the batch treatment tank once a week. However, the dragout rinse was held for two weeks and became overloaded with molybdenum.

The black oxide Safety Data Sheet (SDS) indicated the presence of molybdenum in its formula and Brasstech identified a substitute. The newly identified black oxide is molybdenum free and the company has run tests to assess its efficiency in the chemical coating process. While the company conducted tests with the new chemical, the dragout rinses were transferred to drums/totes and wastehauled offsite. On March 2, 2022, OC San issued a compliance requirement letter requiring Brasstech to 1) submit a corrective action report identifying the root cause of the molybdenum violation and detailing the facility's efforts to achieve long-term compliance with permitted discharge limits; 2) develop a pollutant source identification report characterizing each wastewater source at the facility and 3) institute scheduled maintenance and clean up of the dragout rinse holding tank to reduce the risk of excessive solids accumulation and carryover to the pretreatment system.

On February 23, 2022, the OC San resampling event detected multiple molybdenum and selenium violations for which an NOV was issued on March 17, 2022. On March 22, 2022, OC San conducted a compliance inspection to investigate the root cause of the molybdenum and selenium violations. During the compliance inspection, Brasstech attributed the molybdenum and selenium violations to the dragout rinse tank immediately downstream of the black oxide tank, which was the same root cause of the molybdenum violation detected in the facility's discharge on January 11, 2022. The company reported that on February 23, 2022, the dragout rinse was still being pumped to the batch treatment tank on a weekly basis. Brasstech also reported that the wastestream from the black oxide tank was stored in totes and was still waiting for the approval from Vice President of Operations to commence wastehauling offsite.

Brasstech has expressed interest in isolating the dragout rinse tank, wastehauling its content, and submitting wastehauling records to OC San, as required. Alternatively, Brasstech may opt to propose measures to attain long-term compliance including the implementation of Best Available Technology (BAT) treatment for this wastestream.

On April 1, 2022, a compliance requirement letter was drafted, and it is currently under internal review.

On March 31, 2022, Brasstech had a zinc daily average violation for which an NOV was issued on June 16, 2022. On June 2, 2022, OC San issued an NOV for the March 2022 monthly limit exceedance for zinc. Brasstech also had a June 2022 zinc monthly limit exceedance for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and continue to monitor Brasstech's discharge and compliance status on a quarterly basis.

Brothers International Desserts (West) (Permit No. 1-600582)

Brothers International Desserts (West) (Brothers) is an ice-cream and frozen novelty manufacturer. Most of the wastewater is generated by the cleaning and sanitizing of equipment used for the manufacturing processes. All the wastewater generated on site is treated by a pH adjustment system before discharge to the sewer.

January 1 – June 30, 2022

On April 6, 2022, Brothers West had a pH violation, for which an NOV was issued on April 26, 2022. On April 27, 2022, Brothers West submitted their corrective action report attributing the root cause of the pH violation to a malfunctioning sensor on the pH adjustment system. Brothers West further stated that the malfunctioning sensor failed due to poor materials of construction. As a corrective action, Brothers West upgraded to a more robust pH sensor and a digital gateway better suited for their application. Brothers West also implemented hourly pH testing of their wastewater with a handheld instrument to confirm compliance. In May 2022, OC San conducted a follow-up inspection and resampling to verify effectiveness of corrective actions implemented onsite. The resampling results showed no further pH violations.

Brothers West had no further violations during this reporting period. OC San will continue to monitor Brothers West's discharge and compliance status on a quarterly basis.

Cadillac Plating, Inc. (Permit No. 1-021062)

Cadillac Plating, Inc. (Cadillac) is a job shop metal finishing facility. Wastewater-generating processes include alkaline and acid chloride zinc plating, bright tin plating, bright nickel plating, sulfuric anodizing, alkaline cleaning, acid activation, chromate conversion coating, chemfilm, and associated rinses. The facility engages in rack plating only. The facility operates a continuous hydroxide pretreatment system that consists of pH adjustment, chrome reduction, flocculent addition, clarification, and sludge dewatering with a filter press. Spent solutions are treated in a batch pretreatment system, with the effluent routed through the continuous pretreatment system for further treatment.

July 1 – December 31, 2021

During a compliance inspection on August 20, 2021, OC San noted multiple compliance deficiencies including: 1) the build-up of concentrated waste in running rinses that were being used in a static manner; 2) missing labels on tanks; 3) the automatic batch treatment system was being operated manually, and 4) the continuous treatment system walls were compromised allowing for by-pass of effective treatment. On September 8, 2021, OC San issued a compliance requirement letter, requiring Cadillac to maintain a certified wastewater treatment operator, cease the discharge of concentrated waste to the continuous treatment system, label all tanks and lines, develop a process for control the flow of rinse water to the treatment system, cease the practice of manually operating the automatic batch treatment system, revise the O&M manual with updated batch treatment procedures, and address any by-passing that was occurring in the continuous pretreatment system. OC Can verified progress on the compliance requirements during multiple compliance inspections on November 3 and December 10, 2021. Cadillac submitted multiple revisions of an O&M manual by December 15, 2021, and addressed the other compliance deficiencies noted above.

January 1 – June 30, 2022

Cadillac had no violations during this reporting period. OC San will continue to monitor Cadillac's discharge and compliance status on a quarterly basis.

Cargill, Inc. (Permit No. 1-031060)

Cargill, Inc. (Cargill) is a bulk loading station with facilities for storage and packaging of vegetable-based and animal-based oils. Wastewater is generated by steam cleaning of packaging equipment and washdown of loading, processing, and packaging areas. Pretreatment at the facility consists of a skim basin followed by clarification for the removal of oil and fat and pH adjustment.

In October 2019, OC San issued a compliance requirement letter requiring Cargill to develop a stormwater mitigation plan to divert stormwater from sewer discharge. In November 2019, with the assistance of their consultant, Cargill submitted their response to the compliance requirement letter. OC San reviewed the submittal and considered it to have adequately addressed the issues at the time.

July 1 – December 31, 2021

OC San issued a compliance requirement letter on July 15, 2021, for Cargill to provide a proposal to mitigate stormwater intrusion into the sewer system. Cargill had requested several extensions to provide a proposal and on September 20, 2021, Cargill submitted a letter requesting a meeting with OC San to discuss potential solutions. On September 29, 2021, a meeting was held between OC San and Cargill to discuss Cargill's potential proposal of applying for a SPDP for their stormwater discharge. On October 22, 2021, Cargill submitted their proposal to modify certain existing structures to minimize stormwater discharge and to apply for a SPDP for the stormwater discharge. OC San is currently reviewing the proposal. On December 14, 2021, OC San conducted an inspection during a rain event and observed that stormwater was actively discharging into the sewer. An NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On March 2, 2022, OC San issued an NOV for Cargill's violation of Ordinance Prohibition on Surface Runoff and Groundwater. On March 8, 2022, OC San rejected Cargill's October 2021 proposal for an SPDP permit and requested an alternative proposal to be provided by March 31, 2022. On March 31, 2022, Cargill submitted a revised proposal. Cargill is proposing to implement a revised operating procedure to manually divert stormwater from several areas during a storm event utilizing switchover valves. Cargill also proposed to reconfigure the piping in the boiler area to discharge directly to the waste treatment basin. Cargill did not provide any revised solution to mitigate the stormwater discharge from the rail track and east truck loading area. On May 13, 2022, Cargill submitted a copy of their updated stormwater operating procedure. OC San is currently reviewing the proposal and will continue enforcement during the next reporting period.

OC San will continue to monitor Cargill's discharge and compliance status on a quarterly basis.

Catalina Cylinders, a Div. of APP (Permit No. 1-031021)

Catalina Cylinders, a Div. of APP (Catalina Cylinders) manufactures high pressure gas cylinders from aluminum alloy material. The cylinders are produced in various sizes for the beverage, medical, and SCUBA diving industries. Wastewater is generated from the alkaline cleaning, hydrostatic pressure testing, and the iron phosphate conversion coating operations. Pretreatment at Catalina Cylinders is limited to a three-stage underground clarifier with filter socks installed in the first stage for oil and grease removal.

July 1 – December 31, 2021

Catalina Cylinders had a monthly chromium violation in December 2021, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On February 14, 2022, OC San conducted a compliance inspection to review the cause of the violation. During the inspection, Catalina Cylinders attributed the violation to an increased in dust generation due to installation of a new dust collection system, and roof repair and installation. Catalina Cylinder indicated that the dust generated may have entered the hydrotesting area and discharged to the holding tank. Additionally, Catalina Cylinder identified that they had solids build-up in the holding tank that may have carried over to the final clarifier. As part of their corrective action, Catalina Cylinder has set up quarterly clean out of the holding tank in addition to the clarifier. On March 3, 2022, OC San issued the NOV for the monthly

December 2021 chromium violation. Catalina Cylinders had no further violations during this reporting period.

OC San will continue to monitor Catalina Cylinders' discharge and compliance status on a quarterly basis.

CD Video, Inc. (Permit No. 1-511076)

CD Video, Inc (CD Video) manufactures CD/DVDs using blank polycarbonate discs that are imprinted from a nickel-plated master disc in replication and duplication machines. Wastewater generated at CD Video includes rinse water from nickel plating process, preclean processes, and rinse water from developing and stripping processes. Pretreatment system consists of pH adjustment, hydroxide precipitation, ultrafiltration of decanted effluent and a final ion exchange polishing step. Sludge is pumped through bag filters, where the solids are collected are waste hauled offsite and the filtrate returns to the start of the pretreatment process.

July 1 – December 31, 2021

On October 11, 2021, CD Video had a nickel violation, for which an NOV was issued on November 30, 2021. CD Video will also be issued an additional NOV during the next reporting period for the October nickel monthly violation. CD Video was unable to determine the root cause of the violation, but the facility recalibrated and cleaned the system as a corrective measure. Additionally, CD Video also confirmed that their ceramic membranes are still functional and do not need to be replaced. Subsequent resamples demonstrated compliant levels for nickel in the wastewater discharge. CD Video also upgraded the size of their final batch tank.

January 1 – June 30, 2022

On January 4, 2022, OC San issued an NOV for the October 2021 nickel monthly limit exceedance. OC San conducted a compliance inspection on January 24, 2022 to review the corrective actions taken. During the inspection, CD Video informed OC San that a potential cause of the violation could be due to improper back flushing of their polishing filter during a change out, though they were not able to verify this. Another potential cause could be due to insufficient mixing of their batch tank, thus the sample collected may have collected a concentrated amount of solids. CD Video had no further violations during this reporting period.

OC San will continue to monitor CD Video's discharge and compliance status on a quarterly basis.

Chromadora, Inc. (Permit No. 1-511414)

Chromadora, Inc. (Chromadora) is a medium-size plating job shop that specializes in decorative chrome finishing. The finishing of a typical wheel begins offsite at an outside paint stripping service that provides organic coating removal. The wheel is then transferred to Chromadora's offsite location for polishing to provide a smooth unblemished surface. Once onsite, the wet surface finishing proceeds with alkaline and acid cleaning, to remove any residue and oxidation, followed by the application of a zincate film to prevent the aluminum surface from oxidizing prior to metal plating. Next, the wheel receives copper plating followed by manual buffing. A soap cleaning step removes any traces of buffing compound followed by electrocleaning, bright nickel plating, and finally chrome plating which completes the wet finishing operations. The wastewater discharge at Chromadora is generated by the various spent process solutions and the associated rinse wastestreams.

In April 2021, OC San conducted a multi-sampling event (24-hr composite and grab samples) in the Talbert Trunk, immediately downstream of Chromadora which resulted in violations of chromium, copper, nickel, and zinc.

July 1 – December 31, 2021

On July 7, 2021, OC San issued an order to immediately cease all non-compliant discharge and to take immediate corrective measures to ensure compliance with the Ordinance and permit. On July 14, 2021, a compliance meeting was held to discuss the results of downstream trunkline investigation and to give Chromadora the opportunity to present the reasons for these non-compliances. Chromadora attributed the high levels of metals in its wastewater discharge to wastewater generated during the cleaning of the batch

treatment tanks coupled with miscommunication between manufacturing process operators and the pretreatment operator. Chromadora believes that operators dumped contaminated wastewater, that eventually discharged to the sewer, without communicating with the lead pretreatment operator. OC San was also informed that the recent compliance issues could have been caused by a lack of pretreatment system adequacy, a lack of pretreatment system operator experience, and excessive wastewater flow overwhelming the pretreatment system capacity. On July 14, 2021, Chromadora agreed to enter into a settlement agreement which was effective on November 30, 2021, and pay a total sum of ten thousand dollars (\$10,000.00). The settlement agreement required Chromadora to take steps to address the compliance deficiencies.

January 1 – June 30, 2022

On January 31, 2022 and March 14, 2022, OC San provided detailed comments on multiple requirements from the Settlement Agreement. However, Chromadora failed to meet all of the requirements of the settlement agreement. In addition, Chromadora had a nickel daily limit violation for which an NOV was issued on March 10, 2022. On May 3, 2022, OC San issued an NOV for the February 2022 nickel monthly limit exceedance.

OC San will continue enforcement during the next reporting period and continue to monitor Chromadora's discharge and compliance status on a quarterly basis.

Circuit Technology, Inc. (Permit No. 1-521821)

Circuit Technology, Inc. (Circuit Tech) is a small print and etch job shop servicing the printed circuit board industry. Many of the production steps are conducted in-house, beginning with customer supplied artwork. Processes include photo imaging, silk screening, solder mask screening, dry-film developing and laminating, scrubbing, resist stripping, and etching.

July 1 – December 31, 2021

On October 19, 2021, Circuit Tech had a pH and copper violation, for which an NOV was issued on November 16, 2021. On November 18, 2021, OC San conducted a compliance inspection to determine the cause of the pH and copper violation. Circuit Tech stated and since confirmed in a corrective action report that an employee spilled a low pH copper cleaning solution, collected the floor waste with a mop and bucket, and subsequently discharged the floor waste to the sewer without additional treatment. Circuit Tech conducted retraining of employees on the proper handling and disposal of waste in the facility.

January 1 – June 30, 2022

Circuit Tech had no violations during this reporting period. OC San will continue to monitor Circuit Tech's discharge and compliance status on a quarterly basis.

City of Newport Beach, General Services

The City of Newport Beach operates a general services yard, which contains several areas for various municipal operations and vehicle maintenance. This yard also serves as a location where vacuum-truck vehicles can unload decant wastewater generated during the cleaning of both city sewer and stormwater piping. The City of Newport Beach has taken measures to prevent the discharge of stormwater to the sewer, including the installation of a rainwater diversion valve and the installation of a sluice gate.

During inspections in March 2021, OC San noted the discharge of stormwater to the sewer as a result of control devices set in the incorrect position. Subsequently, OC San issued a compliance requirement letter, requiring the City of Newport Beach to attend a compliance meeting and take corrective action. Since then, the City of Newport Beach has addressed the compliance deficiencies with improvements to administrative procedures including employee training and signage ensuring that control devices are actuated in the correct position to prevent the discharge of stormwater to the sewer.

July 1 – December 31, 2021

On December 7, 2021, OC San received the updated facility map, plumbing diagram, and corrective action letter from the City of Newport Beach. Also on December 7, 2021, OC San held a meeting with the City of Newport Beach to discuss the updated corrective action and protocol for storm events at the City Services yard. The City of Newport Beach noted a seated gate valve was installed to provide a better indication when the gate is open or closed and stated the protocol that the valve will be closed at all times and only by select management staff. Additional signage was posted in the decanting areas to alert staff that the valve is to remain closed at all times, and to verify this prior to any rain events. On December 8, 2021, OC San received an updated response letter from the City of Newport Beach providing additional comments and corrective actions discussed during the meeting held on the previous day.

OC San will provide a formal response to the City of Newport Beach during the next reporting period and will continue to monitor the City of Newport Beach's compliance status with regard to preventing stormwater discharges to the sewer.

January 1 – June 30, 2022

On June 29, 2022, City of Newport Beach submitted a response letter describing the corrective actions to mitigate the stormwater issues in the trash transfer station drainage area including a new sluice gate installed on the influent line which stops all flow from the transfer station and upper yard area from entering the downstream clarifier (separate from the two clarifiers in the decanting areas). The rainwater diversion valve located upstream of this newly installed sluice gate will be left in place as a redundant protective measure. City of Newport Beach also submitted an updated facility diagram and plumbing plan.

OC San will continue to monitor City of Newport Beach's discharge and compliance status on a quarterly basis.

City of Tustin – Maintenance Yard (Permit No. 1-071058)

The City of Tustin – Maintenance Yard (Tustin Maintenance Yard) conducts fleet maintenance for city automobiles, trucks, and street sweepers, including steam cleaning and pressure washing. The wastewater is routed through a two-stage clarifier through a vault to the sewer system. Clarifier and vault maintenance include regular skimming and a set frequency of sludge buildup pump-out.

In June 2020, an NOV was issued to Tustin Maintenance Yard for a zinc violation. OC San conducted a compliance inspection during which the City of Tustin indicated that the most likely cause of the exceedance was the altered truck routes that may have higher contents of heavy metals. During the inspection, OC San informed Tustin Maintenance Yard of the access issues with the currently configured sampling point.

July 1 – December 31, 2021

On August 31, 2021, Tustin Maintenance Yard had a zinc violation, for which an NOV was issued on September 23, 2021. On September 30, 2021, OC San followed up with Tustin Maintenance Yard via an email to notify of the NOV and required the facility to submit a corrective action report. On October 6, 2021, Tustin Maintenance Yard submitted their corrective action report citing the source of violation to the street sweeper trucks. The facility informed OC San that they have started to log and inspect all items being disposed of at their limited volume transfer station and vendor drop off hours have been modified as well to ensure thorough inspections. Additionally, Tustin Maintenance Yard notified OC San that they have hired Fuscoe Engineering to assist them with a complete review of site and help mitigate zinc non-compliance. In further conversations with Tustin Maintenance Yard, OC San required the facility to provide a date for completion of their site study. On October 11, 2021, Tustin Maintenance Yard submitted a revised corrective action report with a final completion date of January 18, 2022.

January 1 – June 30, 2022

Tustin Maintenance Yard had no violations during this reporting period. OC San will continue to monitor Tustin Maintenance Yard's discharge and compliance status on a quarterly basis.

CJ Foods Manufacturing Corp. (Permit No. 1-521849)

CJ Foods Manufacturing Corp. (CJ Foods) manufactures, packages, and distributes dumplings. Wastewater is generated by the cleaning and sterilization of processing and packaging equipment along with some other miscellaneous washdown. Pretreatment consists of pH adjustment with sodium hydroxide in a 5,000-gallon underground clarifier.

In June 2021, CJ Foods had a pH violation, in which CJ Foods attributed the pH violations to siphoning of sodium hydroxide into the clarifier, which led to excessive dosing in the clarifier. As a corrective action, CJ Foods installed a solenoid valve downstream of the chemical feed pump that is controlled by the pH controller to prevent siphoning from occurring.

July 1 – December 31, 2021

OC San conducted a compliance inspection on July 7, 2021, to review the implementation of CJ Food's corrective action. Resampling and logged pH data provided by CJ Foods showed compliant pH levels in the wastewater discharge.

January 1 – June 30, 2022

CJ Foods had no violations during this reporting period. OC San will continue to monitor CJ Foods' discharge and compliance status on a quarterly basis.

Coast to Coast Circuits, Inc. (Permit No. 1-111129)

Coast to Coast Circuits, Inc. (Coast) is a medium size facility that specializes in quick-turn and semi-production orders for aerospace, commercial, medical, military/defense, and telecommunication applications. The circuit manufacturing processes include cutting the copper clad or unclad materials, photoresist application, inner-layer circuit imaging, resist developing, ammonium etching, and alkaline resist stripping. For multilayer boards, this is followed by brown oxide or plasma surface preparation, lamination, drilling, and plasma or high-pressure de-smear.

Coast to Coast treats dilute rinse waters using an ion exchange system and recycles the treated water back to process tanks. Concentrated process solutions are segregated and treated in an automatic batch treatment system. The automatic batch treatment system consists of one surge tank, a sump, two holding tanks, and two treatment tanks. The system is also equipped with automatic pH and ORP control and uses coagulant, precipitant, and flocculant. The remaining wastewater with negligible or no pollutant concentration levels is routed to the clarifier for pH adjustment prior to discharge to the sewer. As a result of a probation order issued in June 2020, Coast to Coast is required to complete installation of a pH diversion valve system, new clarifier, and effluent flow meter.

As a result of a pH violation, multiple compliance deficiencies, and failure to comply with subsequent compliance requirement letters, Coast to Coast was issued a probation order in June 2020. From August to December 2020, after multiple revisions to compliance requirement proposals, multiple meetings with Coast to Coast, and a copper violation, OC San accepted the proposed changes to the facility. However, Coast to Coast failed to install the proposed pretreatment system and process modifications as accepted by OC San. As a result of a copper violation in March 2021 and continued noncompliance, OC San issued a compliance requirements letter in May 2021, requiring Coast to Coast to complete outstanding probation order requirements.

July 1 – December 31, 2021

On August 12, 2021, Coast to Coast had a lead violation, for which an NOV was issued on October 28, 2021. As a result of Coast to Coast's continued noncompliance and failure to complete the requirements from the original probation order in June 2020 and subsequent compliance requirement letters, OC San issued a cease order on December 8, 2021, requiring Coast to Coast to attend a compliance meeting during the next reporting period.

Coast to Coast had no further violations during this reporting period.

January 1 – June 30, 2022

During a compliance meeting on January 4, 2022, Coast provided updates on compliance schedule requirements including installation of a flow meter upstream of the clarifier and completion of facility drawings. OC San clarified that acceptance was not provided for Coast to install the flow meter upstream of the clarifier and Coast has not completed accurate drawings. OC San issued a compliance requirements letter on March 1, 2022, summarizing the meeting and requiring Coast to submit a proposal for the installation of the flow meter and submit as-built drawings of the facility by March 31, 2022. Coast submitted a proposal with drawings on March 29, 2022; however, the drawings failed to provide the information requested. OC San responded on April 14, 2022, and requested that Coast submit completed drawings by May 16, 2022. To date, Coast has failed to provide accurate and completed drawings as requested.

OC San will continue enforcement during the next reporting period and continue to monitor Coast's discharge and compliance status on a quarterly basis.

Coastline High Performance Coatings, LTD (Permit No. 1-600812)

Coastline High Performance Coatings, LTD (Coastline HPC) manufactures satellite components. Wastewater generating process at the facility includes ultrasonic and alkaline clean, sulfuric acid and ferric chloride etching, chem-film with either sodium dichromate solution or with their clear chem-film solution (trivalent chrome). Dragout for their etching process is used to replenish the process bath while the rinses for the etching and chem-film processes are regenerated via an ion exchange resin and recycled in a closed loop system. Rinses for the alkaline, deoxidizer and clear chem film are discharged to a holding tank. This then feeds a final tank where the wastewater is pH adjusted prior to discharge to the sewer.

July 1 – December 31, 2021

Coastline HPC had a monthly lead violation in November 2021. An NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On February 3, 2022, OC San issued the NOV for the November 2021 monthly lead violation. On March 23, 2022, Coastline HPC provided their root cause analysis and corrective action report. Coastline collected samples from all discharge sources and did not detect the presence of lead in any of the sources. Based on their findings, Coastline attributed the violation to a one-time external contamination from an unknown source. However, Coastline will start covering tanks as part of their corrective action to prevent future contamination in the batch tank and sample collection box. Coastline HPC had no further violations during this reporting period.

OC San will continue to monitor Coastline HPC's discharge and compliance status on a quarterly basis.

Coastline Metal Finishing Corp., A Division of Valence Surface Technologies (Permit No. 1-600708)

Coastline Metal Finishing Corp. A Division of Valence Surface Technologies (Coastline) is a medium size metal finishing job shop for a wide variety of customers in the electronics, medical, aerospace, military, defense and optical industries. Operations includes alkaline cleaning, caustic etch, precious metals electroplating, nickel plating, anodizing, chemfilm, dyeing, passivation, pickling, and tin/tin-lead electroplating. Coastline has three close looped ion exchange systems for removal of nickel, tin-lead, chrome, precious metals and cyanide from the rinse streams. The discharge at Coastline consists primarily of selected running rinses that are discharged to equalization tanks and then to the sewer without any pretreatment.

July 1 – December 31, 2021

During a routine inspection, OC San observed multiple rinses running without processing parts through those rinses. OC San conducted a compliance inspection on October 13, 2021, where Coastline was notified that this practice is considered dilution and is prohibited by OC San's Ordinance. Additionally, OC San also observed the outdoor sump that collects the rinse water has a large opening that allows stormwater intrusion into the sewer system. On October 25, 2021, OC San issued a compliance

requirement letter, requiring Coastline to immediately cease the practice of running rinses without parts being processed and to provide a proposal to implement effective flow control through the rinse tanks to minimize water usage by November 30, 2021. The letter also required Coastline to provide a proposal to mitigate stormwater intrusion to the sewer system by November 30, 2021. On November 30, 2021, Coastline provided a proposal to install conductivity meters on the rinse tanks and to install an awning over the outdoor sump. OC San has requested additional information and details regarding the conductivity meters. Coastline had a monthly cyanide violation in December 2021, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On January 17, Coastline requested an extension to provide a revised proposal to minimize their water usage as the proper staff is now able to address the compliance requirement. OC San extended the proposal submittal deadline to February 7, 2022. Coastline submitted a proposal on February 17, 2022 to install a tank control system that utilizes a conductivity meter to turn on/off a solenoid valve to control water usage. Coastline proposes to install this system in phases and estimates to have the system installed on all running rinses within a year. In the interim, Coastline proposes to implement manual logs to document valve closures for the running rinses. Coastline also provided a proposal to install an awning over the outdoor sump to mitigate stormwater intrusion. On May 3, 2022, OC San accepted Coastline's proposal and required Coastline to submit an implementation schedule and to complete the awning installation by May 30, 2022. Coastline completed the awning installing by May 30, 2022. OC San extended the implementation schedule deadline to August 31, 2022, due to delays in Coastline obtaining the necessary equipment to install and test.

On March 3, 2022, OC San issued the NOV for the monthly December 2021 cyanide violation. Coastline provided a corrective action report via email on February 17, 2022 to address the monthly cyanide violation. Coastline attributed the violation to operator error where operators did not follow the work process in their cyanide neutralizing process. Coastline has since retrained their operators on the proper cyanide neutralizing process. On March 1, 2022, Coastline had a pH violation, for which an NOV was issued on March 17, 2022. Coastline attributed the pH violation to a miscommunication between their operators where operators did not run caustic rinses while running the anodizing rinses. On April 6, 2022, Coastline had another pH violation, for which an NOV was issued on April 19, 2022. On May 3, 2022, Coastline submitted a proposal to install an automatic pH adjustment and monitoring system with audio and visual alarms. OC San is currently evaluating the proposal.

OC San will continue enforcement during the next reporting period and continue to monitor Coastline's discharge and compliance status on a quarterly basis.

Corru-Kraft Fullerton (Permit No. 1-601450)

Corru-Kraft Fullerton (Corru-Kraft) manufactures corrugated sheets by combining paper using starch-based adhesive, steam, and hydraulic pressure. The starch adhesive is prepared onsite and pumped to the processing equipment. Wastewater is generated from the washing of the starch mixing tank, boiler blow-downs and several corrugating equipment lines following production. Wastewater passes through a four-stage underground clarifier prior to discharge to the sewer.

In July 2018, March 2019, April 2020 and February 2021, Corru-Kraft had several pH violations. In April 2021, OC San conducted a compliance inspection, during which Corru-Kraft attributed the source of the violations to the fermentation of the stagnant wastewater in their clarifier. OC San identified that pH treatment may be required to ensure consistent compliance. In May 2021, OC San issued a compliance requirement letter requiring Corru-Kraft to submit a proposal for a pH adjustment system by June 30, 2021.

July 1 – December 31, 2021

Due to several pH violations that occurred, OC San determined that Corru-Kraft's discharge has a reasonable potential to violate OC San's limits and converted Corru-Kraft's Class 2 permit to a Class 1 permit on August 1, 2021. Corru-Kraft submitted their final proposal to install an automatic pH adjustment system on July 13, 2021, which included a pH data logger, audible and visual alarms and an automatic shut

off valve. OC San accepted the proposal on July 20, 2021. Corru-Kraft completed the installation of the pH adjustment system on October 13, 2021. OC San conducted a compliance inspection on October 21, 2021, to verify the installation of the pH adjustment system. Corru-Kraft had no violations during this reporting period.

January 1 – June 30, 2022

Corru-Kraft had no violations during this reporting period. OC San will continue to monitor Corru-Kraft's discharge and compliance status on quarterly basis.

CP-Carrillo, Inc. (McGaw) (Permit No. 1-571316)

CP-Carrillo, Inc. (CP-Carrillo) manufactures original equipment steel connecting rods and aluminum pistons used in high performance racing applications. The products, which are designed in-house, are manufactured primarily with CNC (computer numerical control) machines on site. The company has another facility nearby for machine shop support.

Wastewater is generated from the cleaning, tumbling, and deburring of engine parts comprised of aluminum, steel, brass, and chrome. The pretreatment system at CP-Carrillo consists of a batch tank which collects sludge and water from the cleaning, tumbling, and deburring of engine parts comprised of aluminum, steel, brass, and chrome. The batch tank drains to a conveyor belt paper filtration system. As the paper filter collects solids, wastewater drains through the belt into a sump collection. When enough solids/foam accumulate on the filter paper a float is engaged to advance the paper forward into a collection bin, collecting the used paper for waste-hauling and pulling fresh paper out for the next amount of sludge filtration. The sump collection weirs into another sump collection compartment before it is pumped through a cartridge filter assembly, and then into the wall-mounted sample box that gravity drains to the sewer. The sample box is configured with baffles to promote settling and ports for box cleaning and sample collection.

January 1 – June 30, 2022

On June 13, 2022, CP Carrillo, Inc (McGaw) had an oil & grease daily maximum exceedance violation. OC San will issue an NOV for the oil & grease violation and conduct enforcement during the next reporting period. OC San will continue to monitor CP-Carrillo's discharge and compliance status on a quarterly basis.

Crest Coating, Inc. (Permit No. 1-021289)

Crest Coating, Inc. (Crest Coating) performs powdercoating and specialty finish application to aluminum and steel parts supplied by outside customers. Operations include paint stripping, alkaline cleaning, phosphate conversion coating, zirconium conversion coating, and zinc phosphate coating. Wastewater is generated from rinses and some spent process chemicals used for cleaning and coating operations. Crest Coating employs a continuous pretreatment system comprised of conventional hydroxide metals precipitation and clarification. Precipitated solids are removed and processed through a filter press. Filter cake is wastehauled.

July 1 – December 31, 2021

On August 3, 2021, OC San issued an NOV for Crest Coating's monthly average nickel exceedance in May 2021. On August 18, 2021, OC San conducted a compliance inspection, at which time Crest Coating was unable to identify the source of the violation. Following the inspection, OC San requested Crest Coating to further review the violation and submit a corrective action report which identified the source for the nickel violation and detailed the facility's efforts to implement a solution for long-term compliance with permitted discharge limits.

On September 2, 2021, Crest Coating submitted a corrective action report. Crest Coating was unable to identify the source as the facility cited operations and maintenance parameters were consistent with historical records; however, in an effort to ensure long-term compliance, Crest Coating reported the facility would implement annual training concerning operations and waste management.

January 1 – June 30, 2022

Crest Coating had no additional violations during this reporting period. OC San will continue to monitor Crest Coating's compliance and discharge status on a quarterly basis.

Diamond Environmental Services, LP (Permit No. 1-600244)

Diamond Environmental Services, LP (Diamond) is a supplier of temporary fencing, portable toilets, portable sinks. Wastewater is generated from the washing and cleaning of portable toilets. The wastewater is routed to an underground clarifier before discharge to the sewer. Pretreatment currently consists of manual addition of pH adjustment chemical.

As a result of a pH violation and treatment system deficiency, OC San issued a compliance requirement letter in October 2020, requiring Diamond to install a 24-hour continuous pH data logger at the sample point, install an automatic pH adjustment system, and complete corrective actions to ensure long term compliance. After the issuance of an additional compliance requirement letter with new requirement due dates, Diamond completed the installation of the 24-hour continuous pH data logger in June 2021. Diamond requested a two-week extension to submit their proposal for the pH adjustment system to evaluate the operational data based on the recently installed data logger, which OC San granted.

July 1 – December 31, 2021

On July 7, 2021, Diamond submitted their proposal for an automatic pH adjustment system with an automatic shutoff valve with audible and visual alarms. OC San accepted Diamond's proposal on July 12, 2021 and required Diamond to complete the implementation of the proposal by August 31, 2021. On September 2, 2021, Diamond completed the installation of the pH adjustment system. OC San conducted a compliance inspection on September 27, 2021, to verify the installation of the pH adjustment system.

January 1 – June 30, 2022

Diamond had no violations during this reporting period. OC San will continue to monitor Diamond's discharge and compliance status on a quarterly basis.

Dr. Smoothie Enterprises – DBA Bevolution Group (Permit No. 1-600131)

Dr. Smoothie Enterprises – DBA Bevolution Group (Dr. Smoothie) processes, packages, and distributes fruit beverage concentrates. The operations performed include mixing of concentrates manufactured offsite, packaging, and distribution.

As a result of Dr. Smoothie's pH noncompliance in 2018, 2019, and 2020, OC San issued a compliance requirement letter, requiring the installation of an automated pH adjustment system. After the pH adjustment system was installed, Dr. Smoothie continued to have pH violations in October and November 2020, and March and April, 2021.

In May 2021, OC San issued a compliance requirement letter, requiring Dr. Smoothie to provide a proposal to address the inadequacy of their pH system, install audible and visual alarm system as well as an automatic shut-off valve. Dr. Smoothie submitted their proposal to install a batch treatment process for pH adjustment prior to discharging to the sewer in addition to the audible/visual alarms and automatic shut off valves, which OC San accepted.

July 1 – December 31, 2021

Dr. Smoothie had a deadline to complete the installation of the system by July 31, 2021. However, Dr. Smoothie requested an extension due to a delay in receiving the equipment needed. OC San extended the completion deadline to September 15, 2021. Dr. Smoothie completed the system installation by October 25, 2021, due to further delays in receiving equipment. OC San conducted a compliance inspection on November 8, 2021, to verify system installation of the new pH adjustment system and operations. Dr. Smoothie had no violations during this reporting period.

January 1 – June 30, 2022

Dr. Smoothie had a pH violation on January 25, 2022, for which an NOV was issued on February 3, 2022. A compliance inspection was conducted on January 26, 2022 to review the cause of the violation. OC San observed that the automatic shut off valve was not functional, the caustic drum was empty, the pH alarm was not functional, and chemical pumps were not functional. Dr. Smoothie submitted a corrective action report on February 7, 2022, stating that they have replaced the pH probe in the final sample box, installed a key operated switch on their control panel to prevent any bypassing of the automatic control valve, adjusted the dosing set point to achieve a pH between 8.5-9.5, and performed hourly checks on the system. Dr. Smoothie is also considering installing a visual alarm to indicate low levels in the chemical drum and installing a fence around the treatment system. However, Dr. Smoothie has indicated that these items may not be implemented until early 2023 due to the availability of funds.

OC San will continue to monitor Dr. Smoothie's discharge and compliance status on a quarterly basis.

Ducommun Aerostructures (Permit No. 1-021105)

Ducommun Aerostructures (Ducommun) uses fabrication, machining, and a wet chemical milling process to produce components for the aeronautical industry. In addition to the component manufacturing capabilities, Ducommun operates as a job shop supplying chemical milling services on customer supplied parts. Used on flat sheet, formed, cast, or forged aluminum components, the process can chemically mill selected areas to produce features, size parts, or reduce weight while maintaining the parts structural strength. The wet process is routinely used to remove material to close tolerances from fuselage and wing skins, and other complex contoured parts. Wastewater is generated by the aqueous fume scrubbing, the steam regeneration of the carbon solvent-recovery system, the spent acid deoxidation and soap cleaning solutions, and the associated rinse wastestreams.

The wastewater treatment system at Ducommun consists of a continuous treatment system (pH adjustment tank, equalization tank, 5-stage clarifier, and filter press) and a batch treatment system (holding tank, diatomaceous earth filter, reaction tank, and filter press). Rinses are collected in trenches and flow to a pH neutralization tank where the pH is adjusted with spent deoxidizing solution or sulfuric acid. The water is then pumped to a rectangular equalization tank where calcium polysulfide is added as a stabilizing flocculant. After wastewater is treated, it then gravity flows to a 5-stage rectangular clarifier, pH adjusted, and then discharged to the sewer.

During an inspection in May, 2021, OC San noted open tanks and other surfaces that allow for the collection and discharge of stormwater to the sewer. OC San stated that the discharge of stormwater to the sewer is in violation of OC San's Ordinance and subsequently issued a compliance requirement letter in June 2021, requiring Ducommun to submit a proposal to cease the discharge of stormwater to the sewer. Ducommun submitted a proposal to address the issue of discharging stormwater to the sewer.

July 1 – December 31, 2021

On July 12, 2021, OC San issued a letter accepting Ducommun's proposal to prevent the discharge of stormwater to the sewer and completed implementation by August 30, 2021.

January 1 – June 30, 2022

Ducommun had no violations during this reporting period. OC San will continue to monitor Ducommun's discharge and compliance status on a quarterly basis.

Dunham Metal Plating Inc. (Permit No. 1-601023)

Dunham Metal Plating Inc. (Dunham) is a medium size job shop providing finishing services for commercial, consumer, electronics, industrial, and medical applications. The assortment of parts includes fabricated electronic chassis and assorted hardware components. Wet operations are conducted using a manual hoist, with parts connected to the bus-bar using hooks, racks, or wires. The processing of a typical steel part proceeds by alkaline cleaning, electrocleaning, and acid activation. A caustic dip protects the alkaline zinc plating tank from acid drag-in. The processing of the typical aluminum part proceeds by alkaline

cleaning, alkaline etch, acid deoxidation, followed by the anodize or chem film processes. The anodize operation is occasionally followed by one of the many color dye options. The effluent discharge at Dunham is generated by the various spent process solutions and the associated rinses. Pretreatment consists of hexavalent chrome reduction, hydroxide precipitation, coagulant addition, and polymer/flocculation for metals precipitation, and clarification. Solids from the clarifier are processed in a sludge thickening tank and filter press, with filtrate returning to the beginning of the pretreatment system.

July 1 – December 31, 2021

On October 20, 2021, Dunham had a zinc violation, for which an NOV was issued on November 2, 2021. On November 5 and 23, 2021, Dunham had additional zinc violations, for which NOV's were issued on December 7, 2021. OC San conducted a compliance inspection on November 18, 2021, to investigate the cause of the zinc violations. During the investigation, Dunham stated that the source may have been caused by carryover from process tanks to the rinse tanks, the lack of flow restrictors to control the flow rate to the treatment system, and possible issues with inadequate retention time in the treatment system. The October 2021 and November 2021 zinc violations also resulted in monthly limit exceedances, for which NOV's will be issued during the next reporting period.

January 1 – June 30, 2022

On January 11, 2022 and February 3, 2022, OC San issued NOV's for the October 2021 and November 2021 zinc monthly limit exceedances. On March 1, 2022, OC San issued a compliance requirements letter, requiring Dunham to attend a compliance meeting. During the compliance meeting on March 15, 2022, OC San and Dunham discussed multiple causes for the violations including improper racking techniques causing carryover to rinse water and malfunctioning pH probe. Dunham's proposed corrective actions included replacing the pH probe, retraining staff on racking to allow for sufficient draining of concentrated waste, the installation of flow restrictors to control wastewater flow, and the use of a colorimeter to verify zinc concentration in the effluent prior to discharge. On May 3, 2022, OC San issued a compliance requirement letter summarizing the compliance meeting and requiring Dunham to complete the following: 1) Provide a correction action report detailing steps taken to prevent future non-compliance; 2) Submit a revised O&M manual; and 3) Submit updated facility drawings. Dunham submitted the required information for OC San's review during the next reporting period.

OC San will continue to monitor Dunham's discharge and compliance status on a quarterly basis.

Eco Pure LLC (Permit No. 1-601406)

Eco Pure LLC employs chemical hydrolysis of animal tissue using potassium hydroxide (95% water and 5% sodium hydroxide) and CO₂. The cycle starts with adding potassium hydroxide to the tank and heating the tank to 205 F using steam. After the process is complete in 22-23 hours, the PET-550 System injects CO₂ to adjust the pH and the system is programmed to lower the temperature to 110 F. The wastewater is then pumped through a 600-Micron filter and into the sewer. The final discharge temperature is measured by a sensor located at the discharge of the pump. Samples can be collected through a sample port located on the discharge pipe. Before initiating the discharge, a sample will be collected to check the pH. If the pH is high, additional CO₂ is injected. The tank is equipped with two mixers and can process up to 4000 lbs of animal tissue, but normally runs at 3000 lbs. This equates to 600 gallons of wastewater.

July 1 – December 31, 2021

A pH violation was detected during an OC San monitoring event on December 16, 2021, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On December 16, 2021, Eco Pure had a maximum pH violation for which a NOV was issued on January 11, 2022. On January 17, 2022, OC San conducted a compliance inspection to investigate the cause of the pH violation. At the time of this inspection, Eco Pure reported that the cause of the pH violation was an operator error. On December 16, 2021, the operator stopped the process of the alkaline hydrolysis system so that OC San could collect samples, and then pressed the discharge button without knowing that the pH

adjustment cycle did not take place. The operator thought that the carbon dioxide (CO₂) injection cycle used to adjust pH was completed and, therefore, that the pH value would be within the discharge limits. However, during an internal investigation and a review of the manual for the hydrolysis system, Eco Pure learned that the wastewater was discharged without pH adjustment.

On April 13, 2022, OC San issued a compliance requirement letter requiring Eco Pure to submit a corrective action report to OC San identifying the root cause of the pH violation and detailing the facility's efforts to achieve long-term compliance with permitted discharge limits.

OC San will continue enforcement during the next reporting period and continue to monitor Eco Pure's discharge and compliance status on a quarterly basis.

EFT Fast Quality Service, Inc. (Permit No. 1-011064)

EFT Fast Quality Service, Inc (EFT) is a specialty circuit board finishing shop that applies OSP (organic solderability preservative) and performs ENIG, sulfamate nickel, immersion gold, soft and hard gold plating on printed circuit boards. This is accomplished with both acid and alkaline cleaners and microetches commonly associated with circuit board production facilities. EFT has several usually empty lines in which they often do R&D processes for their customers.

July 1 – December 31, 2021

On November 3, 2021, EFT had a daily average nickel violation, for which an NOV was issued on November 30, 2021. On December 16, 2021, OC San conducted a compliance inspection at EFT and the company stated that that one potential cause was an operator error. EFT has standard operating procedures (SOPs) to treat the electroless nickel wastewater using sodium hydroxide precipitation followed by metal grabber and coagulant addition. The company also has an atomic absorption spectrophotometer (AA) onsite to analyze nickel and copper concentration. However, it is typically used only when a colorimeter kit indicates high level of metals. An NOV will be issued during the next reporting period for the nickel monthly limit violation in November 2021.

January 1 – June 30, 2022

On January 11, 2022, OC San issued a compliance requirement letter requiring EFT to submit a corrective action report to OC San identifying the root cause of the nickel violation and the facility's efforts to achieve long-term compliance with permitted discharge limits. On February 3, 2022, OC San issued a NOV due to a monthly average nickel violation determined in November 2021.

OC San will continue enforcement during the next reporting period and continue to monitor EFT's discharge and compliance status on a quarterly basis.

Electrode Technologies, Inc. dba Reid Metal Finishing (Permit No. 1-511376)

Electrode Technologies, Inc. dba Reid Metal Finishing (Reid), formerly listed as Reid Metal Finishing, is a metal finisher providing chromic anodizing, passivation, hard anodizing, sulfuric anodizing, chem film, and plating services of stainless steel, aluminum, copper, brass, bronze, and zinc die castings. Reid processes products for the aerospace, military, medical, and commercial industries. Wastewater is generated from the rinses used in the various surface finish processes and air scrubber wash water. Reid's pretreatment system consists of chrome reduction, cyanide destruction, hydroxide precipitation and sludge filtration.

As a result of multiple cadmium violations in 2019 and 2020, Reid proposed and OC San accepted the installation of multiple cadmium plate-out systems to reduce cadmium concentration in select rinses prior to comingling with other waste streams. As a result of additional cadmium violations in January 2021, OC issued a compliance requirement letter to and held a compliance meeting with Reid. Although Reid identified possible causes for the continued cadmium noncompliance and instituted multiple changes including installation of an additional and larger volume cadmium plate-out, installation of cameras above the cadmium process tanks in order to better monitor employees during plating operations, scheduling formal training for their operators, and proposing additional modifications such as segregating cadmium

tanks and relocating a spin-dryer, OC San requested a proposal for an advanced treatment system to ensure long-term compliance.

In May 2021, OC San received a letter from Reid, in which Reid stated that the cadmium spin-dryer and associated cadmium rinse tanks were located a substantial distance from each other, resulting in cadmium-bearing dragout rinses being collected in areas not designed for cadmium treatment. Reid also noted several modifications and proposals in the letter including the relocation of the cyanide destruct system, an increase in capacity in the first stage of the cyanide destruct system, and proposals for various tank/system relocations and additional recycling processes. In May and June 2021, Reid had additional cadmium monthly average discharge limit violations.

July 1 – December 31, 2021

On July 16, 2021, OC San issued Reid a compliance requirement letter to summarize the compliance meeting held in the previous reporting period. OC San instructed Reid to submit a proposal to achieve long-term compliance with the cadmium discharge limits by August 16, 2021. On August 3, 2021, OC San issued an NOV for the May 2021 monthly average discharge limit exceedance for cadmium. On August 16, 2021, OC San received Reid's proposal to modify and update the facilities pretreatment system to ensure compliance with respect to cadmium discharges. Upon review, it appeared the proposal did not adequately address some issues and required additional modification. On September 2, 2021, OC San issued an NOV for the June 2021 monthly average discharge limit exceedance for cadmium. In August 2021, Reid again exceeded the monthly average discharge limit for cadmium, for which an NOV was issued on November 2, 2021. On September 17, 2021, Reid had a cadmium violation, for which an NOV was issued on October 14, 2021. This violation resulted in a monthly average discharge limit exceedance for the month of September 2021, for which an NOV was issued on December 2, 2021. On November 3, 2021, Reid had a chromium and copper violation, for which an NOV will be issued during the next reporting period. On November 24, 2021, OC San provided comments via email to the proposal submitted by Reid, requesting additional information and clarifications. On December 14, 2021, OC San received an email from Reid responding to the comments generated by OC San regarding the pretreatment system proposal, however a modified pretreatment proposal was not included.

January 1 – June 30, 2022

Reid had no compliance issues during this reporting period. OC San is continuing to work with Reid on pretreatment system modifications with regards to previous cadmium exceedances.

OC San will continue to monitor Reid's discharge and compliance status on a quarterly basis.

Electrolurgy, Inc. (Permit No. 1-071162)

Electrolurgy, Inc. (Electrolurgy) is a large job shop specializing in metal finishing services for aerospace, electronics, industrial, medical, and military/defense applications. The wet processing of a typical aluminum part begins with alkaline cleaning/etching followed by deoxidation and anodizing, or by activation (zincate, copper strike, or nickel strike) and the specified surface finish (electroless nickel, cadmium, or tin plate). The processing of a typical steel part proceeds by alkaline cleaning, hydrochloric activation/descale followed by the specified surface finish (bright nickel, cadmium, copper, electroless nickel). Stainless steel parts generally receive alkaline cleaning followed by passivation or electropolishing. The processing of a typical copper part begins with alkaline and ultrasonic cleaning followed by sulfuric activation, copper strike, and nickel plate. All wet operations are conducted manually using basket, barrel, rack, or wire process techniques. Wastewater is generated from the various spent process solutions and associated rinses.

July 1 – December 31, 2021

On September 9, 2021, Electrolurgy had a daily average cadmium violation, for which an NOV was issued on September 30, 2021. In September 2021, Electrolurgy had monthly cadmium and zinc violation, for which an NOV will be issued during the next reporting period. On October 12, 2021, Electrolurgy submitted their corrective action report which did not adequately address the source of cadmium violation on site. On October 19, 2021, Electrolurgy submitted an updated corrective action report citing the source of cadmium violation to a potential Atomic Absorption (AA) machine calibration issue. Electrolurgy addressed the issue

by reserivicing their AA machine in addition to cleaning the concentration holding tank which is the main pretreatment tank on site.

January 1 – June 30, 2022

On March 17, 2022, OC San issued an NOV for the monthly cadmium and zinc exceedances. The corrective action for the cadmium violation and zinc violation was addressed with the daily violation for cadmium in the last reporting period with the source of violation to an AA machine calibration issue.

Electrolurgy had no further violations this reporting period. OC SAN will continue to monitor Electrolurgy's discharge and compliance status on a quarterly basis.

Embee Processing (Anodize) (Permit No. 1-600456)

Embee (Anodize) specializes in anodizing, chromating, cadmium plating, and passivation for aerospace, commercial, industrial, medical, military/defense, and transportation applications. Embee performs various operations on the parts, including general machining, grinding, honing, sand or glass-bead blasting, and surface masking prior to proceeding to the wet processes. The surface finishing generally proceeds by alkaline degreasing or acid deoxidizing, rinsing, finishing (Alodine, Boeing Seal, chromic anodize, color dye, dichromate seal, hard anodize, nickel seal, passivate, sodium dichromate, or sulfuric anodize), rinsing, mask removal, and drying. All wet finishing operations, including barrel, basket, hoist, rack, and wire process techniques, are manually controlled.

Embee (Anodize) receives wastestreams generated from the wet operations in Buildings 2148 (Anodizing/Hard Anodizing/Passivation/IVD), 2139 (Cadmium Plating), 2150 (Magnaflux). These wastestreams are generated by acid/alkaline cleaning, black chromating, cad coating, cadmium plating, cadmium stripping, chromic dip, copper stripping, electrocleaning, Iridite, nickel strike, nital hydrochloric etch, Nital hydroxide etch, rustproof dip, silver plating, silver strike, silver stripping, sour acid dip, titanium cadmium plating, Unichrome 95 A, and zinc phosphating. Also discharged through Embee (Anodize)'s sampling point are batch-treated wastes generated from the chrome, zinc and nickel-plating operations in Building 2144, as well as RO rejects from two RO systems serving Embee's anodizing and cadmium plating operations.

July 1 – December 31, 2021

On December 1, 2021, Embee (Anodize) had a daily average cyanide violation, for which an NOV was issued on December 21, 2021. An NOV will be issued during the next reporting period for the cyanide monthly limit violation in December 2021.

January 1 – June 30, 2022

On January 4, 2022, OC San conducted a compliance inspection at Embee to investigate the cause of the total cyanide violation detected in the facility's discharge on December 1, 2021. During the compliance inspection, the company could not readily identify the root cause of the violation. OC San learned that on the day that the cyanide violation was detected, the ion exchange regenerant was batch treated for cyanide destruction and discharged to the sewer without checking the cyanide levels. Based on its long-term compliance with cyanide discharges, Embee had assumed the cyanide is not present in the ion exchange regenerant and, therefore, it has been discharged without monitoring cyanide levels for a few years. In the past, the company used a Hach Colorimeter Kit to determine the cyanide concentrations and has discontinued this monitoring procedure since analysis of the rinses and regenerant wastestreams did not indicate the presence of cyanide.

On January 17, 2022, OC San issued a compliance requirement letter requiring Embee to: 1) submit a corrective action report identifying the root cause of the cyanide violation and detailing the facility's efforts to achieve long-term compliance with the discharge limits; 2) develop a pollutant source identification report to characterize the ion exchange regenerant at the facility on different days and 3) monitor the quality of treated regenerant for cyanide prior to discharge to OC San and maintain the monitoring logs onsite and available for OC San review. On February 2, 2022, Embee submitted a corrective action report to OC San. On March 3, 2022, OC San issued NOV for the December 2021 monthly cyanide exceedance.

OC San will continue to monitor Embee's discharge and compliance status on a quarterly basis.

Gemini Industries, Inc. (Permit No. 1-071172)

Gemini Industries, Inc. (Gemini) provides precious metals recovery and refining services for the petrochemical and petroleum refining industries. The facility is a large wet processing operation that specializes in the recovery of platinum, palladium, rhenium, germanium, and gold from spent chemical catalysts. Gemini's wet processes yield purified precious metals, refinable metal residue, and aluminum sulfate solution, sold as alum for municipal water and wastewater treatment.

The recovery of precious metals at Gemini begins with spent catalyst from various customers which arrive in 55-gallon steel drums or flow bins. The catalyst is fed to a sampling system to determine specific constituent concentrations as well as the potential precious metals yield. Processing the spent catalyst begins with sulfuric acid digestion, generating a hot slurry which is pumped to mixing and settling tanks. The liquid decant is filtered through various filtration devices while the solids are wasted, dewatered, and dried. Pure palladium or other precious metals are recovered from the solids while the liquid undergoes further precious metals recovery. Spent rhenium catalyst processing follows a similar procedure aimed at the recovery of rhenium as ammonium perrhenate salts. The effluent discharge at Gemini is generated by decant liquids from the final metal precipitation and recovery process.

July 1 – December 31, 2021

On July 8, 2021, Gemini had a pH Violation, for which an NOV was issued on July 20, 2021. It was determined that the pH monitoring system located in the final equalization tank had failed due to a solenoid valve blocked by solids, causing the adjustment system to overdose an acidic solution. Gemini performed maintenance on the solenoid and pH adjustment system.

Gemini closed their business and ceased wastewater discharge to OC San's sewer in December 2021.

GKN Aerospace Transparency Systems (Permit No. 1-531401)

GKN Aerospace Transparency Systems (GKN) manufactures glass and acrylic transparencies for the military and general aviation and automotive industries. Canopies, windows, windshields, and specialty lenses are manufactured from acrylic and glass base materials formulated and prepared on-site. Acrylic sheets are produced from a methyl methacrylate polymer and allowed to cure between gasketed sheets of glass. The finished sheets are ground down and polished/shaped in large circular chambers with water and abrasive powder to final customer specifications. Some transparencies are layered with various abrasive resistant and/or optical coatings.

As a result of tampering with OC San sampling equipment and discharging stormwater to the sewer, OC San issued a compliance requirement letter, requiring GKN to mitigate the stormwater issue and take appropriate action to prevent the tampering of OC San equipment. After OC San accepted the proposal from GKN, the facility completed the implementation of its corrective actions in June 2021.

July 1 – December 31, 2021

OC San conducted a compliance inspection on July 14, 2021. During the inspection, OC San observed that there were several drains that were not covered and identified additional potential stormwater intrusion entry points. OC San requested that GKN identify all sources that discharge into these entry points and to provide an updated process flow map. GKN informed OC San that they completed covering the drains by October 1, 2021, and provided the updated map on October 29, 2021.

January 1 – June 30, 2022

OC San conducted a compliance inspection on January 19, 2022 to review the completion of the cover installation. During the inspection, OC San observed another drain that was uncovered that is connected to the sewer system, which OC San requested that GKN cover. Additionally, OC San also observed that GKN was continuously running clean water into their trench drains to reduce solids building-up. This practice is in violation with OC San's Ordinance Prohibition on Dilution. OC San also observed two different discharge points for GKN industrial waste that is not captured in their compliance sample point. GKN was

also discharging industrial wastewater through wash sinks located in their other building that is not permitted. OC San issued an NOV on March 2, 2022 to address these violations. On February 16, 2022, GKN informed OC San via email that they are working with vendors to identify and trace their discharge flows and to determine a proper sampling location. They have also ceased wastewater discharge from Building 2 and waste hauling any wastewater generated from that building. GKN has also stopped the practice of running clean city water into the trench drains, and is only flushing the trench drains once every shift. OC San requested that GKN submit a proposal to identify a representative sample point by April 15, 2022. On April 5, 2022, GKN called to request an extension for the proposal submittal as they had encountered delays in their subcontracting. OC San extended the deadline to April 30, 2022. On April 29, 2022, GKN submitted a response to the NOV via email. GKN indicated that they have ceased the continuous discharge of clean water into the trench drains, waste hauled generated wastewater from industrial sinks in Building 2, and are still working to identify a potential location for a representative sample point. OC San extended the deadline to May 31, 2022. On May 25, 2022, GKN requested another extension as the vendor that they selected only provided a quote to perform a feasibility study and did not include any proposals for a representative sample point. GKN would like to pursue a different vendor to provide alternative proposals. OC San extended the deadline for a proposal to June 15, 2022. On June 15, 2022, GKN stated that they have hired a vendor to provide the engineering and design services for a representative sample point, but will require 4 to 6 weeks to produce the design.

OC San will continue enforcement during the next reporting period and will continue to monitor GKN's discharge and compliance status during the next quarter.

Gold Coast Baking Company, Inc. (Permit No. 1-601700)

Gold Coast Baking Company, Inc. (Gold Coast Baking) produces baked goods consisting of loaves, rolls, and sliced breads. Bulk raw materials (a variety of flour, oils, yeasts, and additives) arrive onsite and stored in process tanks or silos which are piped directly to the mixers. Ingredients are mixed and weighed according to recipes to form a dough. All loaf pans and sheet trays are sprayed with an emulsifier/oil mix prior handling the dough. The dough is formed and proofed prior to baking. Certain products like sourdough are required to proof or enter steam chambers prior to baking. After baking, the baked goods are allowed to cool prior to packaging, storage, and shipment to customers.

Wastewater is generated from the cleaning, washing, rinsing, and sanitization of the mixers, process equipment, totes, loaf pans/sheet trays, and floor wastes, as well as from the boiler blowdown. Wastewater collects in a large wet well on west side of the building outside of the maintenance shop. The wet well pumps to a four-stage underground clarifier with a sample box.

On August 25, 2021, OC San conducted an Industrial Waste Survey, in which it was determined Gold Coast Baking required a Class 1 Wastewater Discharge Permit since Gold Coast Baking has the potential to violate pH limits. Gold Coast failed to submit a permit application following multiple requests to submit a permit application.

January 1 – June 30, 2022

On March 7, 2022, OC San issued an NOV to Gold Coast Baking for discharging wastewater without a valid permit. OC San directed Gold Coast Baking to submit a permit application by March 31, 2022. A Class 1 Wastewater Discharge Permit Application was received on March 16, 2022.

On June 6, 2022, OC San issued an compliance requirement letter, requiring the installation of an automatic pretreatment system to maintain long-term compliance with OC San's pH discharge limits, and the installation of an effluent meter to accurately measure all industrial wastewater discharged to OC San's Sewerage Facilities. Gold Coast Bakery is required to submit a proposal for these two items no later than July 31, 2022.

OC San will continue to monitor Gold Coast Baking's discharge and compliance status on a quarterly basis.

Goodwin Company (Permit No 1-031043)

Goodwin Company (Goodwin) manufactures household cleaning and surface treatment products which are formulated from raw chemical feedstocks and soft water. Floor and equipment wash-downs represent most of the industrial wastewater generated, along with a small amount of soft water system reject. Floor run-off from production room and outdoor tank farm area is collected and then pumped over to an equalization tank equipped with a pH monitoring and adjustment system and runs through a series of bag filters before discharging to the sewer.

July 1 – December 31, 2021

OC San conducted a compliance inspection on July 14, 2021, to verify Goodwin's implementation of their stormwater proposal. Valve position logs were kept as proposed and the installation of the stormwater filtration system was completed.

Goodwin had no violations during this reporting period.

January 1 – June 30, 2022

On May 10, 2022, Goodwin had an oil & grease violation for which an NOV was issued on June 16, 2022. OC San requested a corrective action letter to be submitted by June 30, 2022

OC San will continue enforcement during the next reporting period and will continue to monitor Goodwin's discharge and compliance status on a quarterly basis.

Hartwell Corporation (Permit No. 1-021381)

Hartwell Corporation (Hartwell) is a manufacturer of quick release latches, struts, and pins designed for use in the aerospace and aviation industry. Parts are primarily intended for use in airplane and helicopter applications. Hartwell fabricates parts consisting of steel (cold-rolled and castings), aluminum (sheets and castings), stainless steel, titanium, brass, and copper. Dye penetrant inspection is no longer conducted onsite, inspections are now done via dry x-ray operations. Any metal finishing is outsourced to a third party. The building at 900 S. Richfield uses CNC lathes, mills, punch presses, laser saws, brakes, and other machines in daily operations. All machines use coolant, oil, water or a mixture and are closed loop without bleed to the sewer. The only wastewater generating operations located at this facility are from water tumbling and deburring operations.

July 1 – December 31, 2021

On July 22, 2021, Hartwell had daily average and maximum oil and grease violations, for which an NOV was issued on August 9, 2021. On October 19, 2021, OC San conducted a compliance inspection at Hartwell to investigate the cause of the O&G violation.

On October 27, 2021, OC San issued a compliance requirement letter, requiring Hartwell to submit a corrective action report. Hartwell attributed the O&G violation to the dumping of a bucket of mop water in the deburring area.

After reviewing waste manifest records for the maintenance of the underground clarifier, OC San recommended increasing the frequency of the clarifier maintenance and maintaining waste manifest records onsite for OC San's review. On December 7, 2021, Hartwell submitted a corrective action report in which the company reported that signs prohibiting the dumping of mop water into the drain have been posted and a designated mop tote is in place.

January 1 – June 30, 2022

Hartwell had no violations during this period.

OC San will continue to monitor Hartwell's discharge and compliance status on a quarterly basis.

Hightower Plating & Manufacturing Co. (Permit No. 1-021185)

Hightower Plating & Manufacturing Co. (Hightower) manufactures aerospace-quality washers by stamping steel, stainless steel, and aluminum coils. The parts are deburred and then processed through a variety of metal finishing steps depending on the material, to achieve the desired finish. Hightower's metal finishing operations include alkaline cleaning, acid activation, chromic and sulfuric anodizing, cadmium plating, acid zinc plating, nickel plating, caustic etching, deoxidation, chem film, dichromate sealing, and passivation.

Low concentration waste streams are being treated using two ion exchange systems - one for cyanide bearing waste streams and one for non-cyanide bearing waste streams. The treated water is returned to the process tanks for reuse. The regenerant wastes from both ion exchange systems are processed through an evaporator. Concentrated wastes (including but not limited to chromic acid from the anodizing tanks) are wastehailed off-site. A small number of waste streams from the sulfuric anodize and chem film lines are sent to a chromium collection tank and then treated using the chromium reduction system.

July 1 – December 31, 2021

On December 17, 2021, Hightower had daily and monthly cadmium violations, for which NOVs will be issued during the next reporting period.

January 1 – June 30, 2022

An NOV was issued on January 11, 2022, for the cadmium violation that occurred during the previous reporting period on December 17, 2021. In a response letter from Hightower on January 26, 2022, Hightower stated the cadmium violation appeared to be an anomaly and caused by pH fluctuation. Hightower's corrective actions included recalibrating the pH meter and conducting additional 24 hour monitoring sampling events to ensure continued compliance.

Hightower had no further violations during this monitoring period. OC San will continue to monitor Hightower's discharge and compliance status on a quarterly basis.

House Foods America Corporation (East) (Permit No. 1-600906)

House Foods America Corporation (East) (House Foods East) is the second discharge point that shares the same tofu manufacturing operations as House Foods America Corporation (West) (Permit No. 1-031072). This permit was issued to accommodate additional production lines that discharges to a separate clarifier. Equipment and floor wash-down water and the soybean soak and cooking water from the expansion are the main sources of wastewater discharged. Pretreatment is limited to pH adjustment utilizing sodium hydroxide in the third stage of an underground clarifier.

July 1 – December 31, 2021

House Food East had a pH violation on August 16, 2021, for which an NOV was issued on August 31, 2021. House Food East submitted a root cause analysis report on September 12, 2021 that attributed the pH violation to a failure in the pH probe that was damaged by construction activities in the area. The pH probe was giving inaccurate readings which led House Food East to believe that their discharge was within the compliant pH limits. OC San conducted a compliance inspection on September 29, 2021, to review the cause of the pH violation. During the inspection, OC San noted that there were significant solids on the ground that ultimately discharges to the clarifier. OC San also reviewed the pH adjustment system where sodium hydroxide is continuously dosed during production hours regardless of pH in the clarifier. Additionally, the pH adjustment system and clarifier are located outdoors, away from the main production area. There was no notification process that alerts operators when there is noncompliant discharge. OC San also observed that House Foods East was discharging single pass non-contact cooling water into the sewer system, which is a violation of OC San's Ordinance. OC San issued a compliance requirement letter on October 7, 2021, requiring House Food East to remove the single pass cooling water dischargers to the sewer and to provide a proposal for the alternate disposal of this wastewater. The letter also required House Food East to provide a proposal to modify the existing pH adjustment system and to include the installation of audible and visual alarm systems. On October 26, 2021, House Food East provided a proposal to reroute the discharge of the non-contact cooling water to be used for cleaning at their forming process, implement

automatic pH adjustments, and install audible and visual alarms in the production office. OC San accepted the proposal on November 4, 2021. House Food East completed the implementation of the proposal by December 30, 2021.

January 1 – June 30, 2022

OC San conducted a compliance inspection on January 24, 2021 to review the implementation of House Food East's proposal. During the inspection, OC San observed that the single pass non-contact cooling water had been successfully rerouted, and audible, visual alarm had been installed per their proposal. OC San also conducted a 24 hour pH monitoring event between January 24 to January 25, 2022. During this event, House Food East had several instances where the discharge pH was below 6.0. An NOV was issued on February 17, 2022. On February 22, 2022, House Food East appealed the NOV as their pH chart recorder did not show any instances of non-compliant discharges. On April 12, 2022, OC San rescinded the NOV after evaluating onsite data and facility information pertaining to the sample results. However, House Food East intends to investigate potential modifications to their current pH adjustment system.

OC San will continue to monitor House Foods East's discharge and compliance status on a quarterly basis.

House Foods America Corporation (West) (Permit No. 1-031072)

House Foods America Corporation (West) (House Foods West) manufactures tofu food products from raw soybeans. The soybeans are transported to the facility on large tanker trucks and stored in silos, then transferred into large kettles or vats and mixed with water and some lime for cleaning and soaking. The mixture is then pressure cooked and ground up into slurry to extract the soy milk. Calcium sulfate is added as a coagulant to form tofu "bricks" in conveyORIZED formation machines where coloration and flavoring are also added. The bricks come off the lines and are then inspected, then packaged for shipment to customers. Equipment and floor wash-down water and the soybean soak and cooking water are the main sources of wastewater discharged. Wastewater from five boiler units, plus a water softening system for the boiler feed water also contribute to the company's effluent discharge. Pretreatment is limited to pH adjustment utilizing sodium hydroxide in the first stage of an underground clarifier.

July 1 – December 31, 2021

OC San conducted a compliance inspection on September 29, 2021, to review the facility's operation. During the inspection, OC San observed that House Foods West was discharging single pass non-contact cooling water into sewer system, which is a violation of OC San's Ordinance. OC San issued a compliance requirement letter issued on October 7, 2021, requiring House Food West to remove the single pass non-contact cooling water discharge to the sewer and provide a proposal for the alternate disposal of that waste stream by November 15, 2021. House Foods West provided a proposal on October 26, 2021, to reroute the discharge of the non-contact cooling water to be used for cleaning at their forming process, which OC San accepted on November 4, 2021. House Foods West completed the implementation of the proposal by December 30, 2021.

January 1 – June 30, 2022

OC San conducted a compliance inspection on January 24, 2021 to review the implementation of House Food West's proposal. During the inspection, OC San observed that the single pass non-contact cooling water has been successfully rerouted per House Food West's proposal. OC San also conducted a 24 hour pH monitoring event between January 24 to January 25, 2022. During this event, House Food West had several instances where the discharge pH was below 6.0. An NOV was issued on February 17, 2022. On February 22, 2022, House Food West appealed the NOV as House Food West's pH chart recorder did not show any instances of non-compliant discharges. On April 12, 2022, OC San rescinded the NOV after evaluating onsite data and facility information pertaining to the sample results. However, House Food West intends to investigate potential modifications to their current pH adjustment system.

OC San will continue to monitor House Foods West's discharge and compliance status on a quarterly basis.

Howmet Global Fastening Systems Inc. (Permit No. 1-021081)

Howmet Global Fastening Systems Inc. (Howmet) manufactures aluminum, titanium, and steel fasteners. Wastewater-generating processes include cadmium, copper, silver, nickel and zinc plating, potassium permanganate treatment, cyanide stripping, glycol lubricant coating, acid stripping, chromate conversion coating, deburring, quenching, miscellaneous cleaning (mop water), acid/alkaline cleaning, and air scrubbing. Howmet's continuous pretreatment system consists of pH adjustment, cyanide destruction, chromium reduction, clarification, and sludge dewatering using a filter press. Separate, dedicated oil/water separation system is used as pretreatment for their oily water and mop water waste.

In May 2021, OC San conducted a compliance inspection where OC San noted potential stormwater intrusion through the open-top outdoor tanks used in Howmet's pretreatment system and subsequent discharge to the sewer. OC San issued a compliance requirement letter in June 2021, requiring Howmet to submit a proposal to prevent stormwater and runoff from entering the sewer by July 15, 2021, and to implement the accepted proposal by August 31, 2021.

July 1 – December 31, 2021

On July 15, 2021, Howmet proposed to install a canopy over their entire wastewater treatment system. However, Howmet did not provide any drawings or details of the canopy installation. After multiple discussions, Howmet submitted their final canopy design on November 22, 2021, which OC San accepted on November 23, 2021. Howmet is required to complete the implementation of the proposal by January 31, 2022. On August 18, 2021, Howmet had a pH violation, for which an NOV was issued on September 16, 2021. Howmet attributed the cause of the violation to an increased frequency of floor cleanings during the sampling period that caused a drop in the pH in their oily water waste tank. OC San conducted a compliance inspection on October 7, 2021, to review the pH violation. During the inspection, OC San observed that Howmet does not conduct pH monitoring at the oily water tank and at the final discharge tank. Howmet also informed OC San that they do not verify the pH prior to discharging their oily water tank. As part of their corrective action, Howmet has implemented temporary air mixing at their final discharge tank to ensure that the discharge is well mixed after combining with the oily water waste stream. On October 11, 2021, Howmet provided a proposal to install pH probes in their oily water waste tank and final discharge tank. Howmet has also proposed to check the pH of the oily water waste and final discharge prior to discharging. Howmet will only discharge if pH is within compliant limits, and will recirculate and retreat if pH is out of compliance. OC San accepted Howmet's proposal on November 4, 2021, and required Howmet to complete the implementation of the proposal by December 31, 2021. Howmet informed OC San that they have completed the implementation of the proposal on December 23, 2021.

January 1 – June 30, 2022

On May 18, 2022, Howmet submitted the required plans to the City of Fullerton and was waiting for a response from the city. In the interim, Howmet installed temporary canopies above their wastewater treatment system. OC San will continue to follow up with Howmet about completing the installation during the next reporting period. Howmet had a monthly fluoride violation in February 2022, for which an NOV was issued on May 3, 2022. Howmet submitted a corrective action report on May 23, 2022 via email in which Howmet states that they were unable to locate the source of the exceedance after reviewing their processes and logs. However, as a corrective action, Howmet will purchase fluoride test strips to monitor the fluoride concentrations prior to discharge.

OC San will continue enforcement during the next reporting period and monitor Howmet's discharge and compliance status during the next reporting period.

Ikon Powder Coating, Inc. (Permit No. 1-521756)

Ikon Powder Coating, Inc. (Ikon) precleans and powdercoats aluminum and stainless steel provided by outside customers. Cleaning and surface treatment is performed in one of two iron phosphate wash lines each automated with an overhead conveyor track. System wash line #1 is comprised of two phosphate wash tanks and two rinse tanks. System wash line #2 is comprised of one phosphate wash tank and two rinse tanks. The process and rinse chambers recirculate spray. Ikon waste-hauls spent phosphate solution

and transfers rinsewater to a holding tank, before pH neutralization in a batch treatment tank and discharge to sewer.

January 1 – June 30, 2022

On January 20, 2022, Ikon had a daily average zinc violation for which an NOV was issued on February 3, 2022. On March 3, 2022, OC San conducted a compliance inspection at Ikon to investigate the cause of the zinc violation. On March 31, 2022, Ikon submitted a corrective action report. Based on samples collected from both wash lines, Ikon attributed the violation to dragout from system wash line #2. The facility reported that the phosphate solution and rinse tanks from wash line #2 had been retained for a longer than normal operating period. To ensure long-term compliance, the facility waste-hauled the phosphate solution in February 2022, and proposed to collect monthly informational samples from all phosphate tanks to monitor zinc accumulation and mitigate dragout. The facility also proposed to clean the holding tanks every two weeks. On April 5, 2022, OC San issued an NOV for January's zinc monthly average violation.

Ikon had no further violations during the reporting period. OC San will continue to monitor Ikon's discharge and compliance status on a quarterly basis.

Integral Aerospace, LLC (Permit No. 1-600243)

Integral Aerospace, LLC (Integral Aero) is a manufacturer of metal and composite aerospace components consisting of fuel tanks, landing gear, tail hooks, jack screws, and other related service parts for commercial and military aircraft. Integral Aero also performs rebuilding and servicing of parts that it manufactures. The parts are disassembled, cleaned, replacement parts installed, assembled and tested. Raw materials used in the manufacture or processing of parts are aluminum and steel sheet and bar, magnesium, titanium, plastic liners, epoxy resins, fiberglass, adhesives, and cleaning solvents.

Several areas are employed for cleaning and inspection of parts which includes dye penetrant testing. The dye penetrant area is used to inspect for flaws in aluminum parts. Dye penetrant is applied by brush, inspected under ultraviolet light, then washed off with water. Two cleaning systems are employed in the operation. The first is an aqueous spray washer which is used to precision clean metal parts. Parts which have been completed, or in for overhaul which have light machine oils, greases, or magnaflux oil are cleaned in this unit. A steam cleaner is also employed for non-precision cleaning of metal parts and maintenance cleaning of metal machinery parts. Light machinery oils, grease and dirt are removed. All four of these processes are discharged to a common sump where the contents are then pumped to a batch pH adjustment system and discharged.

Additional wastewater is generated during the application of a chromate conversion coating on aluminum parts. Rinsewater generated is collected, filtered through a five-micron cartridge filter, a granular activated carbon vessel, then a series of cationic and anionic ion exchange columns. The treated water is then recycled to a deionized water storage tank to be reused in the rinses again. The columns are backwashed and the regenerant undergoes further batch treatment to reduce chromium to a trivalent state, and finally evaporated. Solids from the evaporator and those settled out in the batch treatment tank are wastehauled.

January 1 – June 30, 2022

In January 2022, Integral Aerospace had a zinc monthly average discharge limit violation, for which an NOV was issued on April 5, 2022.

Integral Aerospace submits laboratory analytical for each batch of wastewater prior to discharge to confirm and verify compliance; however, they did not verify the monthly average discharge limit for this particular sample. Following this NOV, Integral Aerospace chose to wastehaul any batch which exceeded both the daily maximum and monthly average discharge limits.

The permit for Integral Aerospace was voided on January 31, 2022 as a result of a change in ownership. The new owner, PCX Aerosystems, was issued a new permit (1-601618) on February 1, 2022.

JD Processing, Inc. (East) (Permit No. 1-511407)

JD Processing, Inc. (East) (JD Processing) is a metal plating facility for the military, medical, and aerospace industries. The manufacturing processes includes alkaline cleaning, anodizing, passivation, and color dyeing to the customers specifications.

Wastewater is generated through various rinses from the plating process. Wastewater transfers to a pretreatment system via two sumps (one from the anodizing line, and another from the passivation line). Wastewater undergoes pH adjustment prior to discharge to a dedicated sampling box. JD Processing also utilizes a batch treatment system for concentrated rinses and process solutions. Wastewater from the batch system is treated through a separate tank which is pumped through a filter press. The filter press filtrate is returned to the pretreatment system for additional treatment.

January 1 – June 30, 2022

In April 2022, JD Processing had a monthly average discharge limit exceedance for zinc, for which an NOV will be issued during the next reporting period.

OC San will continue to monitor JD Processing's discharge and compliance status on a quarterly basis.

LGM Subsidiary Holdings LLC (Permit No. 1-601313)

LGM Subsidiary Holdings LLC (LGM) manufactures approximately 40 products in the prescription drug, over the counter (OTC) drug and dietary supplement categories in the form of tablets, capsules, and powders. Products are packaged in labeled high density polyethylene bottles as finished product or plastic lined cardboard bulk boxes for subsequent packaging by customer. Laboratory testing is performed to identify raw materials and verify potency and purity of products manufactured. Manufacturing processes include product mixing, encapsulation, compression, and packaging. Processes which generate wastewater are drum rinsing, blender/mixer washing, portable mill washing, air scrubbing, washing of manufacturing suite walls and floors, and laboratory materials testing. LGM does not have a pretreatment system and relies solely on best management practices in handling solvents used at the facility.

July 1 – December 31, 2021

On September 23, 2021, LGM had a daily limit acetone violation, for which an NOV was issued on October 28, 2021. On November 15, 2021, LGM provided a corrective action report which focused on three areas: (1) Raw materials purchased and pharma products produced by LGM; (2) Maintenance chemicals used throughout the facility, and (3) Laboratory chemicals used on site. LGM identified that the facility utilizes variable quantities of Isopropyl Alcohol (IPA) as an inactive ingredient, typically during granulation process. IPA can volatilize during this granulation process and further captured by the on-site water scrubber's countercurrent recirculating water. The facility indicated that a small portion of this recirculation water is discharged to the sewer system continuously and may have resulted in the acetone non-compliance via IPA to acetone conversion. As a corrective measure, LGM indicated that the facility will research potential acetone treatment technologies if further non-compliance arises with acetone.

January 1 – June 30, 2022

LGM had no further violations during this reporting period. OC San will continue to monitor LGM's discharge and compliance status on a quarterly basis.

Linco Industries, Inc. (Permit No. 1-021253)

Linco Industries, Inc. (Linco) is a small metal parts stripping and cleaning facility. Various parts, including automobile wheels and other accessories, are brought in by customers for stripping of paint and other organic coatings in cold and hot strip baths, followed by immersion or manual spray rinsing. Depending on the condition of parts received, Linco may use sulfuric acid or muriatic acid to remove oxides prior to cold or hot strip operations.

The cold strip tanks contain ethanolamine-based chemistry, while the hot strip tank is a Kolene salt bath composed of sodium hydroxide and sodium nitrate chemistry and heated to approximately 550 degrees Fahrenheit.

Wastewater is generated from rinse water used in stripping operations. Linco employs a pretreatment system comprised of conventional hydroxide metals precipitation, clarification, and oil/water separation. Precipitated solids are removed and processed through one of two available filter presses. Filter cake is waste-hauled.

July 1 – December 31, 2021

On September 21, 2021, Linco had a daily limit cyanide violation, for which an NOV was issued on October 14, 2021. On October 28, 2021, OC San conducted a compliance inspection and completed a resample for cyanide. At the time of inspection, Linco attributed the cyanide violation to the unknown composition of parts received and processed; however, a corrective action was not determined. Following the compliance inspection, OC San started a composite sample event. During the sample event, Linco had instantaneous violations for pH and zinc, daily limit violations for cadmium, lead and zinc, and mass limit violations for cadmium, lead, and zinc. On November 4, 2021, OC San issued a compliance requirement letter that directed Linco to further review the cyanide violation, institute corrective actions, and submit a related summary report. On November 23, 2021, OC San issued an NOV for the violations that occurred on October 28, 2021. On December 2, 2021, OC San issued an NOV for September's monthly average cyanide violation. On December 14, 2021, OC San conducted a compliance inspection in response to pH, cadmium, lead, and zinc violations that occurred on October 28, 2021. At the time of inspection, Linco was unable to identify the source and a corrective action was not determined. On December 15, 2021, Linco requested and was granted an extension to submit the corrective action report by February 1, 2022.

January 1 – June 30, 2022

On February 1, 2022, Linco submitted a corrective action report, which detailed the facility's efforts to improve preventative maintenance and to install visual and audible alarms for the pH control system. On March 10, 2022, OC San issued an NOV for the monthly average limit violations for cadmium, lead, and zinc from October 2021. On May 10, 2022, OC San issued a compliance requirement letter to Linco to attend a compliance meeting, and a separate compliance status update concerning the NOVs issued October 14 and December 2, 2021. OC San determined the method type for cyanide samples collected during the sample event on September 21, 2021 was not representative of flow for the respective 24-hour period, and thereby rescinded the cyanide violations. On May 25, 2022, OC San held a compliance meeting with Linco to discuss recent violations. A compliance requirement letter with requirements based on the compliance meeting will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and continue to monitor Linco's discharge and compliance status on a quarterly basis.

LM Chrome Corporation (Permit No. 1-511361)

LM Chrome Corporation (LM Chrome) is an automotive wheel plating facility. Wastewater-generating operations include alkaline cleaning, zincate stripping, zincating, acid activation, copper plating, electrocleaning, anti-tarnish, nickel plating, and chrome plating, and associated rinses. LM Chrome utilizes both batch and continuous pretreatment systems (PTS). The continuous PTS consists of cyanide destruction (stage 1 and 2), chromium reduction, neutralization, flocculation/settling, sludge holding, filter pressing, and final clarification. The batch treatment tank is used for manually treating spent cleaners.

In January 2020, LM Chrome had a lead violation, which also resulted in a lead monthly average discharge limit violation. In March 2020, LM Chrome submitted a response to the Notice of Violation issued for the aforementioned exceedances, stating the source of the lead violation was most likely the residual lead on a wheel received for plating and that lead concentrations would be closely monitored. In response to OC San's permit renewal inspection and issuance of a compliance requirement letter to address stormwater mitigation issues as well as structural problems with the lamella clarifier, LM Chrome submitted a proposal

to install a roof over the pretreatment system to prevent the collection and discharge of stormwater to the sewer, and to repair the lamella clarifier.

July 1 – December 31, 2021

An NOV was issued on December 12, 2021, for the September 2021 cyanide monthly average discharge limit violation. LM Chrome again noted that the pH and ORP probes and controlling devices in the cyanide destruction system had not been calibrated in a timely matter. LM Chrome chose to increase pH and ORP probe calibration frequency to ensure the cyanide treatment system is operating at optimum efficacy.

January 1 – June 30, 2022

In April 2022, LM chrome exceeded the monthly average discharge limit for cyanide. An NOV will be issued during the next reporting period.

LM Chrome had no further compliance issues during this reporting period. OC San will continue to monitor LM Chrome's discharge and compliance status on a quarterly basis.

Logi Graphics, Inc. (Permit No. 1-031049)

Logi Graphics, Inc. (Logi) produces circuit boards to customer specifications and specializes in prototype and small volume orders. The manufacturing typically begins with cutting the copper clad materials, drilling, photoresist application, inner-layer circuit imaging, resist developing, sulfuric peroxide etching, and alkaline resist stripping. This is followed by brown oxide surface preparation and lamination. The holes are de-smearred with sulfuric acid and made conductive through electroless copper plating. Outer-layer circuit development is conducted by either panel plate or pattern plate processes. Panel plate proceeds with copper plating followed by photoresist application, circuit imaging, resist developing, tin/lead (resist) plating, sulfuric peroxide etching, and tin/lead stripping. Solder mask application and final surface finishing, such as hot air solder leveling and/or electrolytic nickel/gold plating, complete the wet processing.

In June 2019, Logi had a copper monthly average discharge limit violation. Logi was unable to identify a root cause for the violation and determined that it was not a recurring event as multiple samples in subsequent months showed copper concentrations below the monthly limit. In January 2020, Logi had another copper monthly limit violation. Logi has experienced a gradual slowdown in production and has been adjusting its pretreatment system to accommodate.

July 1 – December 31, 2021

On October 14, 2021, Logi had instantaneous and daily average copper limit violations, for which an NOV was issued on December 28, 2021.

January 1 – June 30, 2022

During a routine inspection on March 18, 2022, Logi reported that the majority of their processes are not in use and they are only manufacturing a circuit board for one customer which uses the copper etching process. Most of the copper is plated out through a separate process and send off site for recovery. OC San also noted that Logi had an elevated level of lead in the effluent discharge in January 2022. Logi stated that they don't have any lead process and were unaware of the source. Logi also indicated that they would begin closure procedures due to slow business and a lack of customers. OC San requested a facility closure plan.

OC San will follow up on closure activities at Logi and issue an NOV for the Jan 2022 monthly lead exceedance during the next reporting period. OC San will continue to monitor Logi's discharge and compliance status on a quarterly basis.

Maruchan, Inc (Deere) (Permit No. 1-071024)

Maruchan, Inc. – Deere (Maruchan Deere) manufactures dried Japanese ramen noodle food products and packages them into plastic wrapping or polystyrene foam cups. Wastewater is generated by the drained condensation of the dried steamed noodles, and the cleaning of the equipment used in the production

operation. Cleaning occurs at least once a day and includes the food processing equipment as well as the surrounding areas. Wastewater is discharged through collection components along the production lines, which are also cleaned daily.

The pretreatment system at Maruchan consists of a five-stage clarifier, located underground in front of the building along Deere Avenue. A pH adjustment system, located in an adjacent above ground cabinet, continuously controls the acidity of wastewater discharge via an automated caustic chemical feed pump.

January 1 – June 30, 2022

On January 12, 2022, Maruchan Deere had a pH violation for which an NOV was issued on February 3, 2022. On March 1, 2022, Maruchan Deere submitted a corrective action report citing the source of the violation to a broken pH probe. The facility replaced the broken pH probe with a new calibrated pH probe immediately to remedy the issue.

OC San will continue to monitor Maruchan Deere's discharge and compliance status on a quarterly basis.

McKenna Labs, Inc. (Permit No. 1-021422)

McKenna Labs, Inc. (McKenna) produces and packages various personal care products (lotions, gels, creams, liquids, scrubs, serums, oils and pastes). These products are blended on site according to specified recipes and packaged for sale to end users. The blending and packaging equipment is washed & sanitized using sodium hypochlorite. Wastewater is routed through a grease interceptor prior to discharging to the sewer.

As a result of a zinc violation in January 2020, OC San conducted a compliance inspection, during which McKenna indicated that the cause was the packaging of sunblock which contained zinc oxide. McKenna has evaluated their waste management practices and made changes to minimize the discharge of zinc oxide to the sewer. After another zinc violation in January 2021, McKenna attributed the violation to improper cleaning procedure for their bottling equipment. Due to damage to the effluent flow meter and bypass of the sample point, OC San issued a compliance requirement letter, requiring McKenna to provide a proposal to measure the volume of wastewater discharged, a proposal for the location of a representative sample point for the interim and permanent system, and a formal proposal for the planned modifications to their system. McKenna submitted a proposal to install a new flowmeter, a grease interceptor, and a new sampling location downstream of the interceptor, which OC San accepted.

July 1 – December 31, 2021

McKenna informed OC San that the proposal will be implemented by August 16, 2021. OC San conducted a compliance inspection on August 25, 2021, and confirmed implementation of McKenna's proposal.

January 1 – June 30, 2022

McKenna had further violations during this report period. OC San will continue to monitor McKenna's discharge and compliance status on a quarterly basis.

Meggitt (Orange County), Inc. (Permit No. 1-601115)

Meggitt (Orange County), Inc. (Meggitt) produces sensing and monitoring systems that measure physical parameters in the extreme environments of aircraft, space vehicles, power generators, nuclear, oil and gas installations, and test laboratories. Processes used in manufacturing operations include, but are not limited to, machining, sawing, coating, sandblasting, welding, brazing, and metal finishing. Parts worked on are made of Inconel, stainless steel, and tungsten. Wastewater-generating processes include electro-polishing, passivation, etching, filament cleaning, ceramic dicing, ceramic dimensional polishing, ceramic tumbling, nickel bath plating, parts washing, and emergency only discharge of non-contact cooling water from the annealing furnace operations. Wastewater generated from the ceramic dimensional polishing operation, as well as the spent silver nitrate solution from the ceramic tumbling are wastehailed offsite. Rinses from these and the other wastewater generating operations discharge to a three-stage polypropylene aboveground tank, in which sodium hydroxide is added in the first and third compartments

for pH adjustment, as most of the wastestreams are acidic in nature. pH-adjusted effluent is collected in a 750-gallon holding tank to facilitate batch discharge sampling.

July 1 – December 31, 2021

In October 2021, Meggitt had a monthly lead exceedance, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On February 2, 2022, Meggitt had a lead violation, for which an NOV was issued on February 10, 2022. On March 24, 2022, OC San issued an NOV for the October 2021 monthly lead exceedance. On April 12, 2022, Meggitt submitted a corrective action report that attributed the violations to wastewater discharge from the connectors/sensors unit, an area that actively uses lead in the pre-manufacturing of lead-based connectors. Meggitt stated that lead-based connectors are processed and chemically cleaned with aqueous deionized water in this area. Meggitt's corrective action consisted of implementing new cleaning procedures, including wipe down of mixing bowls, sieves and other mixing tools and disposing of these lead bearing wipes and deionized water as hazardous wastes. On May 3, 2022, OC San issued an NOV for the February 2022 monthly lead exceedance. On June 1, 2022, OC San conducted a routine inspection and observed these new procedures in place at the facility.

Meggitt had no further violations during the reporting period. OC San will continue to monitor Meggitt's discharge and compliance status on a quarterly basis.

Micrometals, Inc. (Permit No. 1-021153)

Micrometals Inc. (Micrometals) is a manufacturer of iron and iron/nickel inductor cores for use in power conversion and line filters for the electronics industry. The wastewater generated at Micrometals consists of vibratory deburring solutions, which is drained out of each bowl into a trench running through the wet process area, along with wastewater from two rinses prior to iron phosphate, plus small amounts of wash water from a sink in the shop. The wastewater is routed to a two-stage clarifier before discharge to the sewer.

January 1 – June 30, 2022

In March and May of 2022, Micrometals had monthly limit violations for lead and cyanide, respectively, for which NOVs will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and continue to monitor Micrometals' discharge and compliance status on a quarterly basis.

Orange County Chemical Supply (Permit No. 1-600766)

Orange County Chemical Supply (OCCS) manufactures soaps and detergents for industrial and commercial application.

Wastewater generated from equipment and drum washdown is collected in a centralized sump equipped with a pH probe. At operator discretion, wastewater discharges by diaphragm pump through a filter bag and to sewer.

July 1 – December 31, 2021

On November 4, 2021, OCCS had an oil & grease violation, for which an NOV was issued on November 30, 2021. OC San conducted a compliance inspection on December 14, 2021, to evaluate the operations at the facility and discuss the recent oil & grease violation. At the time of inspection, OCCS was unable to identify the source for the violation and a corrective action was not determined.

January 1 – June 30, 2022

On January 17, 2022, OC San issued a compliance requirement letter that directed OCCS to submit a corrective action report which identified the source for the oil & grease violation, detailed the facility's efforts

to implement a solution for long-term compliance with permitted discharge limits, and provided a complete chemical inventory.

On February 14, 2022, OCCS submitted a corrective action report. OCCS was unable to identify the source; however, the facility proposed to install an in-line filter chamber, update standard operating procedures such that personnel review drum contents prior to washouts to prevent discharge of raw product, and institute regular employee training regarding the facility's waste management practices. The corrective action report did not include a chemical inventory.

On June 16, 2022, OC San reiterated the request for the facility's chemical inventory and requested the design specifications for the filter chamber.

OC San will continue enforcement during the next reporting period and continue to monitor OCCS' discharge and compliance status on a quarterly basis.

Pacific Western Container (Permit No. 1-511371)

Pacific Western Container (PWC) designs and manufactures printed corrugated containers and displays. PWC produces custom cardboard containers to customer specifications by printing, die cutting, & gluing raw corrugated board material. Pacific Western Container utilizes five printing/cutting/folding machines, which uses water-based inks to print pre-designed graphics to the cardboard. Wastewater is generated from printing press cleaning operations as well as miscellaneous shop cleanup & associated rinses.

In May 2021, PWC had a molybdenum violation. A review of the safety data sheets for the inks and other materials used at the facility did not provide a direct cause for the molybdenum violation. PWC will coordinate with their chemical supplier and determine if any product used in their process contains any molybdenum.

July 1 – December 31, 2021

On July 13, 2021, PC had another molybdenum violation, for which an NOV was issued on August 3, 2021. PWC contacted their chemical supplier and determined certain inks and ink bases for violet and magenta contained a molybdate solution. PWC removed these inks and bases from their manufacturing process.

January 1 – June 30, 2022

PWC had no violations during this reporting period. OC San will continue to monitor PWC's discharge and compliance status on a quarterly basis.

PCX Aerosystems – Santa Ana (Permit No. 1-601618)

PCX Aerosystems – Santa Ana (formerly permitted as Integral Aerospace, LLC) is a manufacturer of metal and composite aerospace components consisting of fuel tanks, landing gear, tail hooks, jack screws, and other related service parts for commercial and military aircraft. Integral Aero also performs rebuilding and servicing of parts that it manufactures. The parts are disassembled, cleaned, replacement parts installed, assembled and tested. Raw materials used in the manufacture or processing of parts are aluminum and steel sheet and bar, magnesium, titanium, plastic liners, epoxy resins, fiberglass, adhesives, and cleaning solvents.

Several areas are employed for cleaning and inspection of parts which includes dye penetrant testing. The dye penetrant area is used to inspect for flaws in aluminum parts. Dye penetrant is applied by brush, inspected under ultraviolet light, then washed off with water. Two cleaning systems are employed in the operation. The first is an aqueous spray washer which is used to precision clean metal parts. Parts which have been completed, or in for overhaul which have light machine oils, greases, or magnaflux oil are cleaned in this unit. A steam cleaner is also employed for non-precision cleaning of metal parts and maintenance cleaning of metal machinery parts. Light machinery oils, grease and dirt are removed. All four of these processes are discharged to a common sump where the contents are then pumped to a batch pH adjustment system and discharged.

Additional wastewater is generated during the application of a chromate conversion coating on aluminum parts. Rinsewater generated is collected, filtered through a five-micron cartridge filter, a granular activated carbon vessel, then a series of cationic and anionic ion exchange columns. The treated water is then recycled to a deionized water storage tank to be reused in the rinses again. The columns are backwashed and the regenerant undergoes further batch treatment to reduce chromium to a trivalent state, and finally evaporated. Solids from the evaporator and those settled out in the batch treatment tank are wastehailed.

January 1 – June 30, 2022

In March 2022, PCX exceeded the monthly average discharge limit for zinc. An NOV will be issued during the next reporting period.

OC San will continue to monitor PCX's discharge and compliance status on a quarterly basis.

Performance Powder, Inc. (Permit No. 1-521805)

Performance Powder, Inc. (Performance Powder) precleans and powder coats aluminum and cold rolled steel parts brought in by outside customers, including very large and oversized parts such as metal cabinets and construction framework. Cleaning and surface treating process is performed in an automated conveyerized six-stage wash line which includes alkaline cleaning, iron phosphate surface conversion followed by city water rinse, DI water rinse and RO water rinse. Wastewater generated from rinsing stages of the wash line is pumped to a three-stage aboveground clarifier prior to discharge to the sewer.

In May 2021, Performance Powder had a daily and monthly limit zinc violation.

July 1 – December 31, 2021

On July 13, 2021, OC San issued an NOV for the daily limit zinc violation that occurred in the previous reporting period. On July 19, 2021, OC San conducted a compliance inspection. During the inspection, Performance Powder attributed the zinc violations to infrequent cleanout of the clarifier. On July 20, 2021, Performance Powder performed clarifier pump-out for offsite disposal. On July 23, 2021, Performance Powder submitted a corrective action report that detailed the facility's efforts to mitigate further zinc violations by implementing a routine preventative maintenance program that included improvement to general housekeeping practices and an increase in frequency of clarifier cleanout from an annual to monthly basis. On July 27, 2021, OC San completed a resample for zinc and the results showed compliance. On August 3, 2021, OC San issued two NOVs, one for the previous reporting period's monthly average zinc discharge limit violation and one for the zinc mass limit violation.

January 1 – June 30, 2022

Performance Powder had no violations during this reporting period. OC San will continue to monitor Performance Powder's discharge and compliance status on a quarterly basis.

Pioneer Circuits, Inc. (Permit No. 1-011262)

Pioneer Circuits, Inc. (Pioneer) is a full service shop offering design, manufacturing, and assembly for aerospace, industrial, and military/defense applications. The manufacturing of a multilayer board generally proceeds by cutting the copper clad materials, photoresist application, inner-layer circuit imaging, resist developing, cupric chloride etching, and alkaline resist stripping. This is followed by surface prep (Cobra Bond), lamination, and drilling. The holes are cleaned by either permanganate or plasma etching, and made conductive through electroless copper plating. Outer-layer circuit development is conducted by pattern plate process steps including photoresist application, circuit imaging, resist developing, copper plating, tin/lead resist plating, ammonium etching, and solder stripping. Solder mask application and surface finishing such as hot air leveling or fuse-oil reflow complete Pioneers' wet process operations. The wastewater discharge at Pioneer is generated by aqueous fume scrubbing, boiler blowdown, R.O. reject, various spent process solutions, and the associated rinse wastestreams.

In March 2021, Pioneer exceeded the monthly average discharge limit for lead.

July 1 – December 31, 2021

On August 3, 2021, OC San issued an NOV for the lead monthly average discharge limit exceedance in March 2021. During that month, Pioneer added an additional etching machine without prior notification to OC San, therefore increasing the flow and concentration load to the pretreatment system. Since then, Pioneer adjusted their pretreatment system to account for the additional flow and concentration loading.

January 1 – June 30, 2022

Pioneer had no violations during this reporting period. OC San will continue to monitor Pioneer's discharge and compliance status on a quarterly basis.

Platinum Surface Coating, Inc. (Permit No. 1-521852)

Platinum Surface Coating, Inc. (Platinum Surface Coating) performs copper, nickel, and chrome electroplating of aluminum and steel automotive wheels provided by outside customers. Wastewater generated from rinse tanks is segregated by constituent composition for batch treatment. Cyanide and chrome-bearing rinses are treated separately prior to convergence with remaining wastewater for metals precipitation and pH management. Following precipitation, wastewater is pumped through a filter press to a holding tank then discharged through two carbon and sand filters then to the sewer. Filter cake and spent process tank solutions are waste-hauled.

In May 2021, Platinum Surface coating had a monthly average nickel violation.

July 1 – December 31, 2021

On August 3, 2021, OC San issued an NOV for the monthly average nickel violation in May 2021. On August 31, 2021, OC San conducted a compliance inspection to review the facility operations and discuss the recent monthly average nickel violation. During the inspection, Platinum Surface Coating was informed of the need to target treatment of permitted constituents to monthly average limits versus daily discharge limits to ensure long-term compliance. On September 20, 2021, Platinum Surface Coating submitted a corrective action report to OC San. The report detailed the facility's efforts to mitigate further violations by updating standard operating procedures, which include review of all concentrations against monthly average limits prior to discharge.

January 1 – June 30, 2022

Platinum Surface Coating had no violations during this reporting period. OC San will continue to monitor Platinum Surface Coating's discharge and compliance status on a quarterly basis.

Powdercoat Services, LLC (Bldg J / Plant 3) (Permit No. 1-600168)

Powdercoat Services, LLC (Powdercoat Services) performs surface prewash and conversion coating of aluminum and steel parts, prior to powder coat application per customer specifications. The facility utilizes a three-stage phosphate wash line that is automated with an overhead conveyor track. The process and rinse chambers are set up as recirculating spray. Powdercoat recycles the majority of wastewater generated and waste-hauls the spent phosphate wash solution, with occasional discharges rinse water from the final two stages. Once the tank is ready for discharge, Powdercoat performs manual pH neutralization prior to discharging the wastewater.

In June 2021, Powdercoat Services had a zinc daily and monthly violation.

July 1 – December 31, 2021

On July 6, 2021, OC San issued an NOV for Powdercoat Services daily zinc violation from the last reporting period. On July 28, 2021, OC San conducted a compliance inspection to review the facility operations and discuss the recent zinc violation. On August 6, 2021, Powdercoat Services submitted a corrective action report, attributing the zinc violation to the composition of parts processed during the respective sampling period. The report also detailed the facility's efforts to mitigate further zinc violations by submitting samples for laboratory analysis prior to discharge. On August 23, 2021, OC San issued a compliance requirement

letter to inform the facility that OC San does not agree with the facility's proposed corrective action based on the current production line configuration. Additionally, OC San iterated to the facility that the final rinse chamber continuously cycles during production and prior to batch release which can continue to increase the pollutant concentrations after the sample collection. OC San informed the facility that this operation scheme may lead to a variable characterization of wastewater discharged to the sewer system versus the sample collected for laboratory analysis. On September 14, 2021, OC San issued an NOV for the monthly average zinc exceedance in June 2021. On September 17, 2021, Powdercoat Services reported the facility would no longer discharge from the initial rinse tank in an effort to mitigate the impact of dragout rinses on discharged wastewater.

January 1 – June 30, 2022

Powdercoat Services had no violations during this reporting period. OC San will continue to monitor Powdercoat Services' discharge and compliance status on a quarterly basis.

Precious Metals Plating Co., Inc. (Permit No. 1-011265)

Precious Metals Plating Co., Inc. (PMP) is a precious metals plating job shop that provides specialty plating services for aerospace, electronics, industrial, medical, and military applications. Customer supplied parts include assorted items such as connectors, contacts, fasteners, pins, seals, switches, washers, and other commercial devices. The wet processing of the smaller bulk parts is conducted primarily through barrel plating techniques, although, a particular part or finish may occasionally require racking or wiring. The majority of rinse wastestreams are recycled through a recirculating I.X. system, therefore, PMP's effluent is generated primarily by the chelated rinse wastestreams which are discharged after going through a continuous I.X. pretreatment system utilizing special chelated resins.

January 1 – June 30, 2022

In January 2022, PMP exceeded the monthly average discharge limit for silver, for which an NOV was issued on April 5, 2022.

PMP noted no variations in production or manufacturing in January 2022, noting that the monthly average of all silver samples was only 0.05 mg/L greater than the monthly average limit. PMP stated that additional oversight would be implemented to ensure maximum efficiency for their ion exchange system.

OC San will continue to monitor PMP's discharge and compliance status on a quarterly basis.

Precision Circuits West, Inc. (Permit No. 1-011008)

Precision Circuits West, Inc. (PCW) manufactures rigid double-sided and multilayer printed circuit boards. PCW produces printed circuit boards for commercial, industrial, medical, military/defense, and telecommunication applications.

After computer editing and panelization, data files are sent to an outside film imaging service for photo-tool development. Onsite manufacturing of the multilayer board proceeds by cutting the copper clad materials and automatic scrubbing to prepare the surface for photoresist application. This is followed by inner-layer circuit development including dry film application, circuit imaging, resist developing, ammonium etching, and resist stripping. The printed circuit board surface is prepared through a Cobra-Bond (brown oxide) wet process, followed by lamination and drilling. The board is then sent offsite for hole desmear and conductivity (electroless copper plating) processes. Once returned onsite, outer-layer circuit development proceeds via pattern plate process steps including dry film application, circuit imaging, resist developing, copper plating, tin resist plating, resist stripping, ammonium etching, and tin stripping. The board then is again sent offsite for final surface finishing including hot air solder leveling and/or nickel/gold plating. The completed printed circuit boards undergo legend screening, visual inspection, and routing.

The effluent discharge at PCW is generated by the aqueous fume scrubbing, the various spent process solutions, and the associated rinse wastestreams.

January 1 – June 30, 2022

In February 2022, PCW exceeded the monthly average discharge limit for silver, for which an NOV was issued on May 3, 2022.

PMP noted no variations in production or manufacturing in February 2022, noting that the monthly average of all silver samples was only 0.01 mg/L greater than the monthly average limit.

OC San will continue to monitor PCW's discharge and compliance status on a quarterly basis.

Q-Flex, Inc. (Permit No. 1-600337)

Q-Flex, Inc. (Q-Flex) is a manufacturer of single-sided, double-sided, multi-layer flex, flexible heaters, rigid flex, and sculptured flex printed circuit boards that are used in the aerospace, telecommunications, medical, government, and military applications. Q-Flex specializes in prototypes and exotic designs using a wide range of materials and support services. Q-Flex outsources its' printed circuit board plating process. Wastewater is generated from micro-etching, film developing, and screen washing.

In March 2021, Q-Flex exceeded the copper monthly average discharge limit for copper.

July 1 – December 31, 2021

On August 3, 2021, OC San issued an NOV for the monthly average discharge limit exceedance for copper which occurred in March 2021. In August 2021, Q-Flex again exceeded the copper monthly average discharge limit, for which an NOV was issued on November 2, 2021. Q-Flex determined certain production jobs with smaller than normal circuit traces were more difficult to clean, therefore parts from these processes were scrubbed with wet pumice and then washed without treatment to the sample tank. As a result, Q-flex elected to haul the pumice scrub rinse wastestreams offsite. In addition, Q-Flex purchased in-situ copper testing strips to determine an approximate copper concentration in the sample tank prior to discharge to ensure the wastewater discharged to the sewer meets the copper discharge limits.

OC San will continue to monitor Q-Flex's discharge and compliance status on a quarterly basis.

January 1 – June 30, 2022

Q-Flex had no violations during this reporting period. OC San will continue to monitor Q-Flex's discharge and compliance status on a quarterly basis.

Quality Aluminum Forge, LLC (Cypress South) (Permit No. 1-600272)

Quality Aluminum Forge, LLC (Cypress South) (QAF-South) produces aluminum alloy aerospace forgings. The major manufacturing process equipment consists of forging units, ovens, a heat treat (quench) tank, and a surface preparation/etch line. The forging units are used to drop forge the aluminum parts. Various cycles of forging, heating, etching, and quenching are used to form the metal and obtain the desired metallurgical properties. The wastewater generated from the etch process consists primarily of the rinse waters. Wastewater is treated in a continuous treatment system with pH adjustment, solids settling, filter press, and a clarifier.

In 2019, QAF-South was required to correct multiple compliance deficiencies identified during OC San inspections, including accumulation of excessive solids in the sample box and slug loading of the treatment system with concentrated waste. As a result of a pH violation in August 2020, QAF-South was required to submit a proposal for the installation of a pH chart recorder and pH shut-off valve in addition to a waste management proposal for concentrated waste, which was received by OC San in June 2021.

July 1 – December 31, 2021

On July 19, 2021, OC issued an acceptance letter for QAF-South's proposal to install a pH diversion valve and pH chart recorder to ensure long-term compliance with pH limits.

January 1 – June 30, 2022

During a routine inspection on March 17, 2022, OC San verified installation of the pH monitoring equipment and pH diversion system that was accepted in the previous monitoring period.

QAF-South had no violations during this reporting period. OC San will continue to monitor QAF-South's discharge and compliance status on a quarterly basis.

RBC Transport Dynamics Corp. (Permit No. 1-011013)

RBC Transport Dynamics Corp. (RBC) is a large captive machine shop which manufactures journal and spherical bearings, rod ends, and custom engineered assemblies for aerospace, automotive, and commercial applications. The effluent discharge at RBC is generated exclusively by the facilities vibratory deburring operation. Wastewater from the vibratory deburring operation flows through two, 200 gallon above ground clarifiers prior to discharge. RBC also installed one ion exchange/mixed media tank downstream of the vibratory deburring operation to remove any residual dissolved metals not settled by the above ground clarifiers. All rinse water from the facilities anodizing and plating processes and air scrubber bleed streams are routed to a large Enco evaporation unit. All spent chemicals are wastehauled off site. An ion exchange column is used to treat spray rinse water from the cadmium plate process for cyanide/cadmium removal, then discharged into the evaporator collection sump. Built up sludge from the evaporator is removed and stored in a sludge holding tank before being wastehauled offsite.

July 1 – December 31, 2021

In July 2021, RBC exceeded the monthly average discharge limit for zinc, for which an NOV was issued on October 5, 2021. RBC reviewed their sampling and production data for the month of July and was unable to locate the source of the zinc violation; however, RBC chose to increase the frequency at which the two above ground clarifiers are cleaned and maintained. On December 3, 2021, RBC had a TTO violation, for which an NOV was issued on December 21, 2021. On December 6, 2021, RBC had a cadmium violation, for which an NOV will be issued during the next reporting period. This cadmium violation also caused RBC to exceed the monthly average discharge limit for December 2021, for which an NOV will also be issued during the next reporting period.

January 1 – June 30, 2022

On December 6, 2021, RBC had a cadmium exceedance for which an NOV was issued on January 25, 2022. On January 18, 2022, RBC had another cadmium violation, for which an NOV was issued on March 1, 2022. On March 3, 2022, OC San issued an NOV for the December 2021 monthly average limit exceedance for cadmium. On April 5, 2022, OC San issued an NOV for the January 2022 monthly average limit exceedance for cadmium. On February 14, 2022, OC San received a letter from RBC detailing the explanation for the TTO and cadmium violations.

Regarding the TTO exceedance, RBC conducted an investigation to determine if any chemicals throughout the facility contained chloroform or chloromethane, which did not provide any conclusions. RBC installed signage at various locations throughout the facility where the potential to introduce and dispose of chemicals which flow to the designated sample point were observed, and instructed all employees to follow proper waste disposal practices.

Regarding the cadmium violations, RBC discovered a residue on top of the tank covers below the floor grating above the sump tank leading to the designated sample point. RBC concluded that there may have been some drag-out from the cadmium plating process which was flowing to the sample point. RBC replaced the tank covers and refabricated them to completely seal the tanks and prevent external materials from entering the waste stream.

OC San will continue to monitor RBC's discharge and compliance status on a quarterly basis.

Rigiflex Technology, Inc. (Permit No. 1-021187)

Rigiflex is a small volume prototype PCB manufacturer responsible for rigid, flexible, and rigid/flex printed circuit boards. Rigiflex possesses the ability to perform most PCB fabrication in-house; however, most

operations are currently subcontracted to third-party vendors. Current subcontracted operations include preclean, conditioning and plating.

Rigiflex maintains two film developers, one alkaline etch, one resist stripper, and a tin stripper. Other process operations such as acid cleaning, conditioning, and copper and tin plating are currently inactive.

High-concentrated metal-bearing wastewater generated from active etch equipment is discharged to a closed-loop IX system. Wastewater generated from the film developers, resist stripper and tin stripper is discharged to a final holding tank for pH adjust prior to discharge to a floor sump with a sewer connection. Rigiflex wastehauls spent process chemicals and IX system regenerant.

July 1 – December 31, 2021

On July 7, 2021, Rigiflex had daily limit and mass limit copper violations, for which an NOV was issued on July 20, 2021. OC San conducted a compliance inspection on August 4, 2021, during which Rigiflex attributed the copper violations to operator error. The facility stated an employee had washed the pretreatment containment area and discharged the wash water to the sample point. Rigiflex reported the wash water likely contained trace amounts of copper prior to discharge. On October 12, 2021, OC San issued an NOV for the monthly average copper exceedance in July 2021. Based on conversation during the compliance inspection, and as reported in Rigiflex's letter to OC San dated October 25, 2021, Rigiflex stated the facility would no longer wash the pretreatment containment area. After review, OC San had determined the proposed corrective action did not ensure long-term compliance as there was concern the employee acted without proper training and the facility did not maintain standard operating procedures for all circumstances in which waste may be generated. On November 10, 2021, OC San issued a compliance requirement letter that required Rigiflex to develop or update the existing O&M manual.

January 1 – June 30, 2022

Rigiflex had no violations during this reporting period. OC San will continue to monitor Rigiflex's discharge and compliance status.

Sanitor Corporation (Permit No. 1-601267)

Sanitor Corporation (Sanitor) blends raw ingredients to produce cosmetic and pharmaceutical products including hair gel, cleaners, acne toners and cleansers, and sunscreen. Wastewater generated from equipment washdown is collected in a tote for pH neutralization and discharged to the sewer.

January 1 – June 30, 2022

On February 10, 2022, Sanitor had an oil & grease violation, for which an NOV was issued on March 3, 2022. On April 5, 2022, OC San conducted a compliance inspection. On April 12, 2022, Sanitor submitted a corrective action report which attributed the oil & grease violation to contamination from an oil-based sunscreen. Sanitor reported the facility updated standard operating procedures to include special handling and cleaning for equipment bearing oil-based products, improved waste cataloging, and updated employee training. On May 18 and June 6, 2022, OC San requested a chemical inventory with certificates of analysis for products manufactured, a copy of the facility's manufacturing log, and additional detail concerning the facility's oil & grease waste management. On June 23, 2022, Sanitor submitted a certificate of analysis for the oil-based sunscreen and standard operating procedures for the facility's waste management.

OC San will continue enforcement during the next reporting period and continue to monitor Sanitor's discharge and compliance status on a quarterly basis.

Santana Services (Permit No. 1-021016)

Santana Services (Santana) is a small job shop that welds and brazes aluminum parts for various industries. Wastewater is generated from the preparation and cleaning processes. These processes include a heated caustic tank, a salt rinse tank, a deox tank, two neutralizer tanks, two nitric acid tanks and five rinse tanks. All rinses and process solutions flow to a small collection tank at the end of the process line which is then automatically pumped via level control to a batch holding tank where the pH is adjusted prior

to discharge. When process solutions need to be changed out, they are pumped to the batch discharge tank along with the rinse waters.

July 1 – December 31, 2021

In July 2021, Santana had a monthly chromium violation for which an NOV was issued on October 5, 2021. OC San conducted a compliance inspection on October 20, 2021, to investigate the cause of the violation. During the inspection, Santana informed OC San that they were unable to determine the source of chromium as they only process 6061 aluminum alloy, which had insignificant levels of chromium. However, Santana provided lab reports from 2016 that showed elevated levels of chromium, nickel, copper and zinc from their nitric tank. OC San then proceeded to collect several informational samples from each process tank. These informational samples confirmed that Santana's spent solutions have elevated concentrations of heavy metals, which were being discharged to the sewer without any treatment. During the inspection, OC San also noted that several process tanks located outdoors have the potential to collect and discharge stormwater into the sewer, which is a violation of OC San's Ordinance. OC San issued a compliance requirement letter on November 1, 2021, requiring Santana to immediately cease the practice of discharging spent solution to the sewer, to provide a proposal for the proper waste management of the spent solution, and to provide a proposal to mitigate potential stormwater discharge to the sewer system. Santana provided a proposal to wastehaul all spent solution when solution is no longer within specifications and will only discharge the rinses. Santana also proposed to install covers over all exposed process tanks, which Santana completed by November 30, 2021.

January 1 – June 30, 2022

OC San reviewed Santana's waste hauling manifest during the quarterly inspections. Santana manifest showed that they had only waste-hauled one 50 gallon container of nitric acid during this reporting period. Santana had no violations during this reporting period.

OC San will continue to monitor Santana's discharge and compliance status on a quarterly basis.

Semicoa (Permit No. 1-571313)

Semicoa is a medium size production and research and development facility that fabricates semiconductors for aerospace, commercial, medical, military, and telecommunication applications. Manufacturing process includes oxidation, diffusion furnace cleaning, photoresist, wafer etching, photoresist stripping, injection of various silicon dopants/electroconductive materials into the silicon dioxide substrate, vapor deposition, and glass etching. Wastewater is generated by the aqueous rinsing following the acid cleaning, acid etching, and solvent cleaning process steps, the disposal and pH neutralization of the various spent acidic solutions, reverse osmosis reject, and the cooling tower bleed. Wastewater treatment consists of a pH neutralization system with automated pH controls, setpoint alarms, and recirculation plumbing in the event of a setpoint exceedance.

July 1 – December 31, 2021

OC San conducted a compliance inspection on October 11, 2021, to review potential dilution processes and inadequacy of the existing sample point that was observed during previous inspections. During the inspection, OC San noted the existing sample point (clean-out) does not provide a representative sample for total toxic organic analysis. Additionally, OC San noted that the secondary containment that collects condensate from the liquid nitrogen area also collects and discharges stormwater into the sewer system, which is in violation of OC San's Ordinance. OC San issued a compliance requirement letter on October 25, 2021, requiring Semicoa to provide a proposal to install a representative sample point and to provide a proposal to prevent stormwater discharge to the sewer. Semicoa submitted a proposal to OC San on November 24, 2021. However, the proposal did not provide sufficient details regarding the re-routing of the piping and did not indicate that all wastewater will be routed to the new sample point.

January 1 – June 30, 2022

After several discussions, Semicoa submitted their revised proposal on January 5, 2022. Semicoa proposed to install a sample point immediately downstream of the neutralization system and will route all dilution

flows downstream of the sample point. Semicoa also proposed to construct a leach pit to discharge the nitrogen condensate and any stormwater collected in the secondary containment. On March 1, 2022, OC San accepted Semicoa's proposal and required the implementation of the proposal to be completed by April 15, 2022. On May 4, 2022, OC San conducted a compliance inspection to verify the completion of the proposal implementation. OC San observed that the cooling tower blowdown is still discharging to the sample point and requested Semicoa to reconfigure this line to discharge downstream of the sample point by May 31, 2022. All other aspects of the proposal were implemented as proposed. On May 31, 2022, Semicoa informed OC San that the reconfiguration will be completed during the next reporting period.

OC San will continue to monitor Semicoa's discharge and compliance status on a quarterly basis.

SFPP, LP (Permit No. 1-021619)

SFPP, LP (SFPP) provides bulk storage and distribution of refined petroleum products and fuel additives. The facility includes above ground storage tanks of various sizes that contain gasoline, diesel, ethanol, and fuel additives. Wastewater is generated from tank bottom water draws and drainage at the loading racks.

July 1 – December 31, 2021

During a compliance inspection on December 7, 2021, OC San noted that stormwater is comingled with process wastewater and discharged to the sewer which is in violation of OC San's Ordinance. OC San informed SFPP that the discharge of stormwater to the sewer is prohibited and that SFPP is required to address the non-compliance issue.

January 1 – June 30, 2022

On January 7, 2022, OC San issued an NOV for violating the prohibition on stormwater discharge to the sewer, requiring SFPP to submit a proposal to prevent the discharge of stormwater to the sewer. SFPP has not submitted to proposal to date.

OC San will continue enforcement during the next reporting period and continue to monitor SFPP's discharge and compliance status on a quarterly basis.

Soldermask, Inc. (Permit No. 1-031341)

Soldermask, Inc. (Soldermask) is a printed circuit board job shop specializing in solder mask services and making stainless steel stencils used for solder paste application or component verification. Wastewater is generated by manual pumice scrubbing, photoresist developing, screen cleaning, and associated rinses. Soldermask does not have a pretreatment system apart from a four-stage aboveground clarifier. The spent ferric etch solution, electropolishing solution, and subsequent static rinses are wastehauled.

In March 2020, Soldermask had a nickel monthly average discharge limit violation. In June 2020, OC San staff conducted a compliance inspection and informational sampling during which it was determined that the source of nickel was from a rinse tank connected to an etcher process. Soldermask elected to modify the process and disconnect the nickel rinse from the sample point in lieu of installing additional pretreatment equipment.

In April 2021, Soldermask had another nickel violation. Soldermask attributed the violation to the discharge of floor waste and retrained staff on waste management procedures as a result.

July 1 – December 31, 2021

Soldermask had no violations during this reporting period. OC San will issue an NOV for the April 2021 nickel monthly limit exceedance during the next reporting period.

January 1 – June 30, 2022

On January 11, 2022, OC San issued an NOV for the April 2021 monthly average limit exceedance for nickel. Soldermask previously addressed the nickel violation by retraining staff. In addition, OC San

provided acceptance of Soldermask's proposal to repurpose the single pass cooling water as make-up to the developer unit. Soldermask had no violations during this reporting period.

OC San will continue to monitor Soldermask's discharge and compliance status on a quarterly basis.

South Coast Circuits, Inc. (Bldg 3500 Ste A) (Permit No. 1-601444)

South Coast Circuits, Inc. (SCCI) manufactures rigid double-sided and multilayer printed circuit boards to customers specifications from copper clad and pre-preg materials. SSCI performs their operations in four buildings all located within the same industrial complex (Bldg 3500 A, Bldg 3506 Ste A, Bldg 3512 Ste A, and Bldg 3524 Ste A). Discharges from all buildings are regulated by separate permits.

The manufacturing of a typical multilayer product begins at Bldg 3500 Ste A with the inner-layer circuit development including surface preparation, photoresist application, circuit imaging, and resist developing. The boards move on to Bldg 3506 Ste A for cupric chloride etching and resist stripping; lamination and drilling at Bldg 3524 Ste A; followed by permanganate desmear and electroless copper plating at Bldg 3512 Ste A. Outer-layer circuit development may continue at this point by either panel plate or pattern plate process steps. Panel plate proceeds with copper plating at Bldg 3512 Ste A, photoresist application, circuit imaging, and resist developing at Bldg 3524 Ste A, and cupric etching at Bldg 3506 Ste A. Pattern plate proceeds with photoresist application, circuit imaging, resist developing at Bldg 3500 Ste A, copper plating and tin resist plating at Bldg 3512 Ste A, and ammonium etching and tin stripping at Bldg 3506 Ste A. Final surface finishing, such as nickel/gold plating and hot air solder leveling, is conducted in Bldg 3506 Ste A and Bldg 3524 Ste A, respectively. The boards typically return to Bldg 3500 Ste A for legend screening before completion.

The effluent discharge at Bldg 3500 Ste A under this permit is generated by the photoresist and solder mask developing solutions, and the rinses following the acid cleaning, aluminum oxide surface preparation, photo-film developing, photoresist developing, solder mask developing, and screen cleaning. Pretreatment consists of an automatic pH adjustment system.

January 1 – June 30, 2022

In June 2022, SSCI had a silver monthly average discharge limit violation.

OC San will issue an NOV during the next reporting period and continue to monitor SSCI's discharge and compliance status on a quarterly basis.

Speedy Metals, Inc. DBA Pacific Metal Cutting (Permit No. 1-600767)

Speedy Metals, Inc. DBA Pacific Metal Cutting (Speedy Metals) houses over 35 CNC band saws and cutting machines, including six waterjets with wastewater discharge to the sewer. Waterjets are placed around the facility and have hard plumbed fixtures directly to the sewer at the location of an old facility restroom. The wasted garnet and metal shavings generated by the waterjets is removed via a drum clarification system on the discharge line of each machine. There are two to four drums following each waterjet, in which solids settle out and are wastehauled. There are no metal finishing or other categorical operations conducted on-site, any finishing work is outsourced.

Waste scrap metal is discarded in four bins outside the production floor. Bins are designated for large pieces and shavings and are hauled off for recycling at monthly intervals. Speedy Metals uses water soluble oil in cutting operations and are wastehauled as needed. There is also a closed loop cooling tower with a chiller, but no wastewater is discharged to the sewer.

Wastewater generated during plywood cutting process passes through 20-, 5-, 2- and 1-micron filters in series prior to discharge to the compliance sampling point.

January 1 – June 30, 2022

On February 1, 2022, Speedy Metals had instantaneous and daily average O&G-min. violations for which an NOV was issued on February 24, 2022. On March 10, 2022, OC San conducted a compliance inspection to investigate the root cause of the O&G violations. During the inspection, Speed Metals attributed the O&G

violation to an employee inadvertently dumping a small amount of used oil into the final stage of the filtration water barrels, which is the compliance sample point. OC San noticed that the lid of the filtration water barrels has a 3-inch diameter opening, which allows for the discharge of untreated or concentrated waste into the facility's wastewater effluent. On May 5, 2022, OC San issued a compliance letter requiring Speedy Metals to submit a corrective action report identifying the cause of the O&G violations and detailing the facility's efforts to achieve long-term compliance with permitted discharge limits.

On February 1, 2022, Speed Metals facilitated a staff refresher training as part of the facility's corrective actions to prevent and eliminate future O&G discharge violations. The training emphasized that the dumping of any solution or wastes into the filtration water barrels is not acceptable. Additionally, Speedy Metals properly labeled the barrels indicating that dumping is not allowed. OC San recommended sealing the 3-inch diameter openings and restricting access to the barrels to eliminate the risk of future dumping.

OC San will continue enforcement during the next reporting period and will continue to monitor Speedy Metals' discharge and compliance status on a quarterly basis.

Stainless Micro-Polish, Inc. (Permit No. 1-021672)

Stainless Micro-Polish, Inc. (SMP) performs metal finishing operations for medical and scientific instrumentations. Wastewater generating operations include caustic degreasing, acidic surface preparation, permanganate surface iron removal, deoxidation, micro-polishing, and ultrasonic cleaning. SMP operates a continuous pretreatment system that consist of hydroxide precipitation, pH adjustment, coagulation, flocculation, clarification, and solid dewatering.

January 1 – June 30, 2022

SMP had a monthly zinc violation in June. An NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and will continue to monitor SMP's discharge and compliance status.

Star Manufacturing LLC, dba Commercial Metal Forming (Permit No. 1-600653)

Star Manufacturing LLC, dba Commercial Metal Forming (Star) is a metal forming shop that specializes in stamping and forming metal tank heads on mechanical and hydraulic presses for use in the manufacture of vessels. Star's ancillary operations include plasma cutting metal blanks, plasma and oxyacetylene trimming, metal heat treating, pressure washing finished tank heads, welding, steam cleaning, and part washing. Wastewater is generated from the steam cleaning and washing of production pieces, which are typically coated with lubricant. Wastewater is collected in an underground sump and then pumped to an equalization tank from which the wastewater is treated through zeolite columns and bag filters before discharge to the sewer.

During 2019, Star had multiple O&G-min. violations while optimizing the zeolite column treatment system and installing a final holding tank.

In 2020, Star continued to have O&G-min. violations. As a result of a dilapidated influent holding tank, Star failed to test each batch prior to discharge. Star installed a new influent holding tank and added a second zeolite column which demonstrated improved O&G removal efficiency. Without prior notification to OC San, Star later replaced the two smaller zeolite columns with two larger 55 gallon vessels that contain zeolite to remove O&G. Star indicated that the new vessels would provide additional contact time, over and above what is required to achieve non-detect for oil & grease. Star also indicated that jar testing has indicated good results with increased contact time using zeolite. Star's permit was also revised to include weekly oil & grease monitoring and require Star to test every treated batch of wastewater for oil & grease prior to discharge.

January 1 – June 30, 2022

On April 28, 2022, Star had an O&G-min violation for which an NOV was issued on May 12, 2022. During an inspection on May 19, 2022, Star indicated that they could not identify the cause of the violation and were not aware of the maintenance status of the zeolite vessels. While Star continues to sample and test

each batch of treated wastewater prior to discharge, the data does not indicate that the filtering media is sufficiently effective to maintain long-term compliance.

OC San will continue enforcement actions during the next reporting period and continue to monitor Star's discharge and compliance status on a quarterly basis.

Statek Corporation (Main) (Permit No. 1-021664)

Statek Corporation (Main) (Statek) manufactures surface mount and through hole, ultra-miniature quartz crystals and oscillators. Statek's products are utilized in communications, medical electronics, industrial controls, and precision military application devices. The wafer fab long and short lines produce wastewater which is treated using an ammonia pH adjustment system prior to discharge to the sewer.

July 1 – December 31, 2021

Statek had pH violations on September 14 and December 1, 2021, for which NOVs were issued on September 30 and December 21, 2021, respectively. During the sampling events, OC San noted that there were multiple waste streams that were not previously identified and may be causing the fluctuation in pH. Statek failed to identify a cause for the violations.

January 1 – June 30, 2022

On February 17 and 18, 2022, Statek had pH violations for which an NOV was issued on March 3, 2022. During a compliance inspection on April 26, 2022, Statek could not readily identify the source of the violation. However, there are multiple waste streams that are discharged downstream of the pH adjustment system that may contribute to a low pH condition. Statek indicated that they have initiated an investigation to determine which waste streams may need to be redirected to the pH adjustment system. On May 16, 2022, OC San issued a compliance requirement letter, requiring Statek to attend a compliance meeting. During the compliance meeting on June 2, 2022, Statek indicated they had collected pH data from multiple waste streams and determined that some have low pH that could cause pH violations at the sample point. Statek also stated that they have repaired and replaced any malfunctioning timers that may be contributing to the low pH condition and are proposing to reroute all waste streams to upstream of the pH adjustment system. OC San stated that Statek would need to evaluate the adequacy of the pH adjustment system to handle the additional flow. In addition, Statek is required to provide additional information about the city water line that may be contributing dilution flow to the sample point.

OC San will continue enforcement during the next reporting period and continue to monitor Statek's discharge and compliance status on a quarterly basis.

Statek Corporation (Orange Grove) (Permit No. 1-521777)

Statek Corporation (Orange Grove) (Statek) designs and manufactures ultra-miniature quartz crystals and crystal oscillators using photochemical etching and laser frequency adjustment techniques. These products are produced in the smallest packages available using semiconductor technology. Statek products are utilized in communications, medical electronics, industrial controls, and precision military application devices.

The manufacturing process includes the cutting of quartz bars to create quartz wafers, lapping and surface polishing, photolithography to pattern multiple resonators on each wafer, chemical etching, and vacuum deposition where electrode patterns of nickel, chrome or aluminum are deposited. Individual resonators are then diced from the wafer and mounted in a ceramic package and hermetically sealed. If the product is an oscillator, then the crystal would be packaged with an IC to create a finished oscillator. As the final step, each resonator is electrically tested to insure that they are within customer specifications. Crystals are packed for shipment in tubes, trays, and in tape and reel configurations.

The spent photochemicals are collected and shipped off-site for disposal. Wastewater from process rinses is collected, the pH carefully monitored and neutralized onsite, then discharged through a clarifier and into the sewer. Gold and chrome etching wastes are also wastehauled.

January 1 – June 30, 2022

On March 8 and 9, 2022, Statek had pH violations, for which an NOV was issued on March 24, 2022. During a compliance inspection on April 26, 2022, Statek could not conclusively identify the source of the violation. Waste streams are routed to a semi-batch pH adjustment system in which wastewater is not discharged to the sewer unless the pH is in compliance with permit limits. Statek stated that an employee may have operated the pH adjustment system in manual mode after it appeared that the adjustment tank had failed to discharge wastewater. However, it is unclear how the pH system was operated in manual mode and if there is a procedure to operate the pH adjustment system in manual mode. OC San staff noted that Statek is required to notify OC San of any process changes including changes made to the treatment and discharge of wastewater and that automatic pretreatment systems should not be operated in manual mode unless they were designed to do so. On May 4, 2022, OC San issued a compliance requirement letter, requiring Statek to submit a corrective action report, identifying the cause of the violations and what actions were taken to implement a solution to maintain long-term compliance with permitted discharge limits. Statek has responded with a corrective action report, confirming that the pH adjustment system is working properly and that staff has been trained to verify compliance with limits prior to wastewater discharge.

OC San will continue to monitor Statek's discharge and compliance status on a quarterly basis.

Stepan Company (Permit No. 1-021674)

Stepan Company (Stepan) manufactures surfactants used in various consumer detergents, soaps, and other specialty blends. Stepan manufactures surfactants utilizing three processes: continuous falling film sulfonation, detergent blending by batch processing of alkanolamides, and detergent blending by batch processing of betaine. Pretreatment at the facility includes pH adjustment and batch oxidization of 1,4-dioxane.

During a routine inspection in May 2021, OC San was informed that Stepan discharges their 'first flush' of stormwater into the sewer system, which is prohibited by OC San's Ordinance. In June 2021, OC San conducted a compliance inspection and verified that the 'first flush' of stormwater captured in secondary containments and surface runoffs of outdoor processing areas were transferred to Stepan's wastewater collection system and eventually discharged to the sewer.

July 1 – December 31, 2021

OC San issued a compliance requirement letter on July 15, 2021, requiring Stepan to provide a proposal to prevent the discharge of stormwater to the sewer. Stepan provided a proposal on August 31, 2021, to install a rain gauge, automatic three-way valves and pumps, as well as reconfiguring part of the discharge piping to divert stormwater to the stormwater system. However, the proposal did not provide sufficient detail on how Stepan intends to dispose of the stormwater collected during first 1/10th of an inch that does not get diverted to the storm drains. Stepan provided a revised proposal on November 15, 2021, to halt automatic conveyance of process and stormwater and will manually transfer the collected water to the stormwater system once the valves have been diverted. OC San is currently reviewing the proposal and will provide a response to Stepan during the next reporting period.

On August 4, 2021, Stepan had a 1,4-dioxane violation for which an NOV was issued on August 31, 2021. Stepan attributed the violation to wastewater that bypassed isolation via a vent line from the deaerator. Untreated wastewater dropped on the pad underneath and discharged to the final batch tank. Stepan took measures to treat the batch tank prior to discharge. However, due to a lack of communication, Stepan discharged wastewater to the sewer prior to completing the treatment, resulting in the violation. Stepan submitted a corrective action report on September 29, 2021, where Stepan rerouted the vent line to a containment tote bin to collect water overflow. Stepan also implemented a policy where all wastewater batches are tested for 1,4-dioxane prior to discharge to the sewer. Subsequent resampling demonstrated compliance.

January 1 – June 30, 2022

Stepan had requested that OC San allow them to complete the piping changes by October 13, 2022 so they can conduct the work during a planned shutdown. OC San is currently reviewing this additional request and will provide a response to Stepan's proposal in the next report period.

OC San will continue enforcement during the next reporting period and will continue to monitor Stepan's discharge and compliance status.

Summit Interconnect, Inc. (Permit No. 1-600012)

Summit Interconnect, Inc (Summit) is a large, full-service printed circuit board manufacturer. Wastewater is generated from spent solutions and rinses from the processing of copper laminates into printed circuit boards. Wet processes include alkaline cleaning, acid cleaning, cupric chloride and ammonia etching, resist stripping, oxide treatment, electroless copper plating, copper/lead plating, solder mask, developing, tin stripping, screen cleaning, deburring, pumice scrub and miscellaneous cleanup/mop water. Summit operates a continuous pretreatment system utilizing separate carbon vessels and ion exchange systems to treat unchelated copper wastestreams and chelated copper wastestreams. Treated unchelated waste stream is further treated by another set of ion exchange system to produce deionized water that is re-used for their production. Treated chelated copper rinses and unrecycled treated unchelated copper rinses are discharged to the final discharge tank, where pH adjustment occurs prior to discharge. Regeneration waste from the chelated and unchelated copper wastestreams is treated through electrowinning, while regeneration waste for the deionized water production is discharged to the final discharge tank for pH adjustment. Batch treatment is performed if the continuous system does not have the capacity. Batch treatment systems consists of pH adjustment, flocculation, and clarification followed by sludge dewatering and a filter press. Decant from batch treatment is discharged to the final discharge tank.

July 1 – December 31, 2021

On July 15, 2021 and August 18, 2021, Summit had copper mass violations for which NOVs were issued on September 23, 2021 and September 16, 2021, respectively. OC San conducted a compliance inspection on September 2, 2021, to investigate the cause of these violations. During the inspection, Summit attributed the cause of the mass violations to an increase in production hours. Subsequent correspondence clarified that a certain percentage of the flow from the unchelated copper waste stream bypassed the ion exchange system and was directly discharging to the final discharge tank due to a partially plugged carbon vessel. Summit had another copper violation on October 13, 2021, for which an NOV was issued on November 30, 2021. Summit will also be issued an additional NOV during the next reporting period for the October 2021 copper monthly limit violation. Summit provided two potential causes of the violations including an uncalibrated atomic adsorption instrument and a delay in sample processing that may have caused contamination. However, Summit failed to provide substantiated evidence to support these potential causes.

January 1 – June 30, 2022

On January 4, 2022, OC San issued an NOV for the October 2021 copper monthly limit exceedance. OC San issued a compliance requirement letter on January 13, 2022 requiring Summit to attend a compliance meeting. A compliance meeting was held on January 25, 2022. During the meeting, Summit attributed the copper violations to a plugged carbon vessel on the unchelated system, an undersized motor and pump and solenoid valves being stuck open for several production processes. Summit has since replaced the carbon vessel, replaced the pump and motor, and replaced the solenoid valves. Summit has also informed OC San that they are reviewing the efficiency of the existing system and will evaluate if further modification of their treatment system is required to ensure long term compliance with permit conditions and limits. OC San issued a compliance requirement letter on March 25, 2022 to summarize the discussion of the compliance meeting and to require Summit to conduct multiday self-monitoring, provide updated pretreatment system drawings and operation and maintenance (O&M) manual by April 30, 2022. Multi-day self monitoring demonstrated compliance and Summit submitted the updated pretreatment system drawings on April 28, 2022. However, Summit was not able to provide an updated O&M manual by the deadline. OC San extended the deadline for the O&M manual to June 15, 2022. On June 20, 2022, Summit

provided a draft procedure of their treatment operations, but the submitted procedure did not satisfy the requirement for the O&M manual. OC San requested that Summit submit a revised O&M manual by July 15, 2022. Summit had no further violations during this reporting period.

OC San will continue to monitor Summits' discharge and compliance status on quarterly basis.

Superior Plating (Permit No. 1-021090)

Superior Plating is a medium-sized plating shop serving both aerospace (95%) and commercial (5%) customers. Wastewater generating operations include acid activation, alkaline cleaning, alkaline tin plating, black chromate, bright dip, bright nickel plating, bright silver plating, bright tin plating, cadmium plating, chem film, clear chromate, copper plate, copper strike, electroless nickel plating, fuse oil, gold plating, hot D.I. rinsing, liquid water displacement, matte silver plating, nickel plating, nickel strike, nitric dip, olive drab, passivation, permanganate (descale), rinsing (countercurrent, running, & static), silver strike, tin / lead plating, yellow chromate, and zincate. Superior operates a batch pretreatment system, which consists of pH adjustment, cyanide destruct, chromium reduction, chemical precipitation, clarification, coagulation, filter press and final effluent filtration. The non-metal wastestreams undergo pH adjustment only.

January 1 – June 30, 2022

On May 19, 2022, Superior Plating had a cadmium violation, for which an NOV was issued on June 16, 2022. Superior Plating attributed the cause of the violation to incomplete settling time of the batch treatment system. Superior Plating noted that the operator only allowed 30 minutes of settling instead of an hour. Superior Plating has since retrained their operators to ensure proper settling prior to discharge.

OC San will continue enforcement actions during the next reporting period and monitor Superior Plating's discharge and compliance status during the next reporting period.

T.A.C. West, Inc. (Permit No. 2-022088)

T.A.C. West, Inc. (T.A.C.) provides washing services for the interior and exterior of tanker trailers containing food grade products. Wash water is routed through trench drains which discharges to an underground industrial waste clarifier for solids settling prior to discharge to the sewer. T.A.C. manually adjust pH when necessary, by adding caustic powder into the trench drain.

July 1 – December 31, 2021

On November 15 and 16, 2021, T.A.C. had pH violations for which a NOV was issued on November 23, 2021. OC San conducted a compliance inspection on November 24, 2021. During the inspection, T.A.C. attributed the pH violations to the washing of trailers that contained tomatoes. T.A.C. informed OC San that they have stopped washing those trailers since the violations. However, T.A.C had another pH violation on December 13, 2021 for which a NOV issued was issued on December 21, 2021.

January 1 – June 30, 2022

OC San issued a compliance requirement letter on January 13, 2022 to require T.A.C. to attend a compliance meeting and to inform T.A.C. that their Class 2 permit will be converted to a Class 1 permit due T.A.C.'s potential to violation the pH limit. A compliance meeting was held on February 1, 2022 to discuss T.A.C.'s pH violations. During the meeting, T.A.C. informed OC San that they will be installing an automatic pH adjustment system as they acknowledged that manual treatment may not guarantee long term compliance with their permit conditions and limits. However, the proposal provided did not contain sufficient details regarding the operation of the pH adjustment system. OC San issued a compliance requirement letter on March 2, 2022 that summarized the meeting discussion and to require T.A.C. to provide a revised proposal for a pH adjustment system that should contain the following design components: a continuous data logger, audible/visual alarm, proper mixing, and a control mechanism to prevent discharge of non-compliant wastewater. On April 29, TAC West informed OC San that the facility will be shut down by May 13, 2022. Facility was confirmed to be out of business and the permit was voided on May 19, 2022.

Taylor-Dunn Manufacturing Company (Permit No. 1-021123)

Taylor-Dunn Manufacturing Company (Taylor-Dunn) manufactures industrial electric utility carts, lifts, and load carriers. Wastewater is generated from the iron phosphate wash process prior to any painting application. Wastewater is directed to a sump where pH adjustment with caustic occurs. Wastewater then overflows to the final sump for clarification prior to discharge.

July 1 – December 31, 2021

Taylor-Dunn had a monthly zinc violation in November 2021. An NOV will be issued during the next reporting period.

January 1 – June 30, 2022

OC issued the NOV for the November zinc monthly violation on February 3, 2022. Taylor-Dunn attributed the violation to solids accumulated in the discharge piping directly downstream of the sample box. As part of their corrective action, Taylor-Dunn will begin cleaning the discharging piping in addition to the sump pit. As of May 2, 2022, Taylor-Dunn underwent a change of ownership, and the permit has been voided.

Thompson Energy Resources, LLC (Brea) (Permit No. 1-601469)

Thompson Energy Resources, LLC (Thompson) produces crude oil from multiple well sites, separating ground water from the extracted oil with heat and chemical treatment. The produced water flows through heat treatment in the heat room followed by storage in the wash tank. The water from the wash tank is routed to the surge tank which is one of the first steps in the chemical treatment of the wastewater on-site. This is followed by storage in one of the two wastewater storage tanks. One of these storage tanks has been out of service for a few years and the new ownership is currently working on putting it back in service to improve the final effluent's temperature and additionally improve O&G separation.

January 1 – June 30, 2022

Thompson had an O&G-min. violation on April 14, 2022, for which an NOV will be issued during the next reporting period.

OC San will continue enforcement during the next reporting period and continue to monitor Thompson's discharge and compliance status on a quarterly basis.

Timken Bearing Inspection, Inc. (Permit No. 1-531415)

Timken Bearing Inspection, Inc. (Timken) is a captive shop specializing in aircraft engine bearing refurbishing. Timken conducts zero discharge core metal finishing operations of electroplating (electrolytic nickel) and chemical etch (nital etch) where all waste is captured and hauled. Timken also has discharge from the core metal finishing operations of chemical etching (caustic etch) on-site, as well as two sources of ancillary operations generating wastewater to the sewer (1) deburring wastewater and (2) fluorescent penetrant inspection wastestreams.

Timken refurbishes company owned aircraft engine bearings, primarily from M50 and 52100 Steel. During the refurbishing process, the bearings may be washed with solvent in cleaning booths remove residual oil and lubricants, then rinsed in soft water. Reclaimed solvent from the booths is collected and directed to a distillation system for heating and condensing, and ultimately reuse. No wastewater is discharged to the sewer from the distillation system. Other refurbishing processes that generate wastewater include hand brushed electrolytic nickel plating, nital etch, caustic etch/ alkaline cleaning, wet deburring operations with a vibromill and media/soap, mop water, and fluorescent penetrant inspection. Deburring operations includes milling and burnishing to remove minor surface imperfections; this operation uses ceramic media, as well as burnishing compounds and soaps including LB160, Almco 506 RD, and Almco 2330 (all of which have a neutral pH). The dry operations conducted on-site includes solvent cleaning, burnishing, disassembly, grinding, honing, polishing, and packaging. All wastewater generated in the nital etch, plating, mop water and solvent cleaning operations is wastehauled. A mineral oil is applied to final parts prior to sealing in plastic and shipping, no waste oil or water from this operation is generated.

All wastewater generating from refurbishing operations is from the alkaline part cleaning processes, deburring operations, or inspection operations. The cleaning process wastewater is a static rinse following an alkaline cleaning operation in a caustic bath of pH 14. This caustic bath has been identified as a chemical etch core metal finishing operation. The company also collects and treats compressor water through an oil/water separating unit, and directs separated oily water to treatment.

The pretreatment system includes a flocculation tank where the chemical RM-10 is added and flash mixed. From the flocculation tank, wastewater is filtered through a scrolling reel of particulate filter paper to remove solids, through additional filter socks, and held in a discharge tank. Wastewater is then pumped to the in-ground sample box in the parking lot on the west side of the building.

January 1 – June 30, 2022

On June 2, 2022, OC San issued an NOV for the monthly limit cyanide exceedance in March 2022.

OC San will continue enforcement during the next reporting period and continue to monitor Timken's discharge and compliance status on a quarterly basis.

TTM Technologies North America, LLC. (Coronado) (Permit No. 1-521859)

TTM Technologies North America, LLC (TTM Technologies) is a large scale, full-service printed circuit board shop. Wastewater is generated from the processing of copper laminates into printed circuit boards. Wet processes include copper plating, electroless copper plating, nickel/gold plating, solder mask, alkaline cleaning, acid cleaning, scrubbing, developing, resist stripping, tin stripping, etching, screen cleaning, oxide coating, and miscellaneous cleanup/mop water. Rinse schemes practiced at the facility include significant use of static rinses in addition to running rinses. TTM Technologies operates a continuous pretreatment system to treat low concentration wastestreams, consisting of pH adjustment and multiple ion exchange resin beds, with a large portion of the effluent reused onsite. Batch treatment is performed on spent solutions and ion exchange backflush and consists of pH adjustment, flocculation, and clarification followed by sludge dewatering with a filter press. Concentrated wastestreams (etchant, spent plating solutions) are wastehailed offsite.

As a result of copper violations in August and September 2018, TTM Technologies was required to implement corrective actions which included submitting updated facility drawings and operations and maintenance (O&M) manual. TTM Technologies attributed ongoing copper discharge limit noncompliance to ion exchange regeneration issues in June 2019 and pump failure of process equipment in December 2020. Consequently, TTM technologies implemented several corrective actions which include replacing control valves and level sensors, implementing high level alarms and pump controls, installing basket screens at the end of all pump discharge pipes, and providing additional training to employees.

July 1 – December 31, 2021

On November 2, 2021, TTM Technologies had a copper daily limit violation, for which an NOV was issued on November 23, 2021. TTM Technologies submitted a corrective action report that attributed the violation to particulates passing through while decanting the batch treatment tanks as the operator was changing out the bag filters. TTM Technologies also identified that the batch tanks did not settle within the required time to complete treatment due to operator error. Additionally, TTM Technologies identified that the recirculation lines between the filter press filtrate and the batch tank were damaged. TTM Technologies has since retrained their operators, fixed the damaged connections, and improved inspection logs, requiring management sign off. OC San conducted a compliance inspection on December 29, 2021, to verify the implemented corrective actions. A resample of the wastewater showed compliance.

January 1 – June 30, 2022

On June 1, 2022, TTM Technologies had another copper violation, for which an NOV will be issued during the next reporting period. TTM Technologies submitted a corrective action report via email on June 30, 2022. TTM Technologies attributed the violation to an operator error where they were decanting their batch tank right above the sludge level, thus causing solids to carry over. TTM Technologies' corrective action was to redirect the decant to the filter press for recirculation and additional solids removal prior to final

discharge. TTM Technologies is also planning on installing filters prior to the final discharge tank to catch additional solids.

OC San will continue enforcement actions during the next reporting period and will continue to monitor TTM Technologies' discharge and compliance status on a quarterly basis.

United Pharma, LLC (Permit No. 1-531418)

United Pharma is a custom manufacturer of nutritional soft-gel capsule and mixed formulation products. Wastewater is generated from equipment cleaning in a designated washroom, gelatin melting tanks vacuum lines, water used in the liquid ring pumps, dehumidifier in drying room, floor mop water, hand sinks and laundry room used to wash rags. Additional sources of wastewater include RO reject, boiler blowdowns and chiller blowdown. Pretreatment currently consists of a 3-stage clarifier with a sample point and a pH adjustment system. Wastewater is continuously recirculated from the sample point to the first stage, to help act as a mixer, to ensure compliant pH discharge, and to keep the pH probe in the pipe wet at all times. Once the level in the sample point reaches a setpoint, a float is triggered and a pump will be activated to discharge the wastewater into the sewer.

January 1 – June 30, 2022

During the permit renewal inspection on January 3, 2022, OC San observed that the current sample point of the final stage of the clarifier does not allow for a representative pH grab sample, which is a requirement of OC San's Ordinance. On March 3, 2022, OC San issued an NOV, which also required United Pharma to provide a proposal for a representative sample point by March 31, 2022. On March 30, 2022, United Pharma submitted their proposal to move the pH adjustment from the last stage of the clarifier to the third stage. However, the proposal does not address that the grab sample collected is still not representative since contents in the final stage of the clarifier continues to change until the float switch is activated. OC San requested that United Pharma submit a revised proposal by April 15, 2022. On April 15, 2022, United Pharma submitted a revised proposal where they proposed using the third stage of the clarifier for the sample point, which still does not address the non-compliance. OC San requested that United Pharma submit another revised proposal by April 29, 2022. OC San was onsite on April 25, 2022 to review United Pharma's proposal. During the site visit, United Pharma explained that the only other option would be to sample from the clean out downstream from the final stage of the clarifier. However, the line will be pressurized as the sewer discharge line goes upgradient, which will not be an acceptable sample point. OC San is currently evaluating United Pharma's proposal and will provide a response to the facility during the next reporting period.

OC San will continue enforcement actions during the next reporting period and will continue to monitor United Pharma's discharge and compliance status on a quarterly basis.

Vi-Cal Metals, Inc. (Permit No. 1-521846)

Vi-Cal Metals, Inc. (Vi-Cal) is a metals recycling facility. Metal parts and shavings are dropped off from trucks and various sized bins. Vi-Cal sorts some of the parts and crushes/shreds larger parts for compaction into shipping containers and delivery to foundries off site. Wastewater is generated from pressing waste oil and coolant from metal parts, which is collected for treatment before discharge to the sewer system.

As a result of multiple noncompliance issues related to stormwater discharge to the sewer and the use of inadequate pretreatment, OC San issued a compliance requirement letter to Vi-Cal in December 2020, requiring the facility to address the compliance deficiencies. After receiving multiple proposals and compliance inspections in 2021, OC San accepted Vi-Cals proposed pretreatment system changes, including a separate batch treatment system and pH adjustment system. Vi-Cal completed the implementation of the accepted proposal in June 2021.

July 1 – December 31, 2021

OC San conducted a compliance inspection on August 25, 2021, to verify the completion of the pretreatment system, as well as roof covering and berm around the treatment system.

January 1 – June 30, 2022

Vi-Cal had no violations during this reporting period. OC San will continue to monitor Vi-Cal discharge and compliance status on quarterly basis.

Winonics (Brea) (Permit No. 1-031035)

Winonics Brea (Winonics) is a printed circuit board manufacturer. Winonics manufactures multi-layer printed circuit boards using core materials of epoxy and polyimide laminate coated with copper foil of various thickness. Manufacturing processes include core material shearing, surface cleaning, photo resist application, brown oxide treatment, lamination with prepreg/resin sheets, electroless copper coating, tin pattern plate, etching, oxide scrubber, ENIG automated coating line, electroless nickel and gold or silver coating, and hot air solder leveling.

The pretreatment system at Winonics consists of batch treatment for spent process chemicals and drag outs, and continuous heavy metals precipitation for rinse waters and some dilute chemistries, using standard pH/ORP controls with chemical feeds for caustic, coagulants, and polymer / floc additions. Batch treatment effluent is directed to the continuous system for final treatment before discharge to the sewer, and solids from batch treatment transferred to the solids thickening tank. Spent resist stripper solution is processed through a separate batch treatment (pH adjust) then a dedicated filter press for solids dewatering before the filtrate is discharged to the sample point, along with developer and resist stripper rinses as these waste streams contain no heavy metals. Aqueous fume scrubber overflow is directed to the pretreatment system, while RO water treatment system reject is plumbed downstream of Winonics sample point.

July 1 – December 31, 2021

On October 6, 2021, Winonics had a copper violation, for which an NOV was issued on November 2, 2021. On November 18, 2021, OC San conducted a compliance inspection at Winonics to discuss the root cause of the copper violation and to resample. During the compliance inspection, OC San emphasized the importance of having a proper sample point that can be appropriately cleaned and maintained to prevent the build-up of excessive solids. On November 23, 2021, Winonics submitted a corrective action report to OC San. Winonics proposed to replace the sample point with a new downstream sample tap that will provide a representative sample point. During subsequent routine inspection, OC San confirmed that the new sample point has been installed. In October 2021, Winonics had a monthly copper violation, for which an NOV will be issued during the next reporting period.

January 1 – June 30, 2022

On March 17, 2022, OC San issued an NOV for the October 2021 monthly copper violation which had been addressed in the previous reporting period. Winonics had no further violations during this reporting period.

OC San will continue to monitor Winonics' discharge and compliance status on a quarterly basis.

Winonics, Inc. (Permit No. 1-021735)

Winonics, Inc (Winonics) is a large, full service printed circuit board facility. Industrial wastewater is generated by the processing of copper-clad laminates into printed circuit boards. Wet processes performed at the facility include photoresist application, copper plating, electroless copper plating, nickel/gold plating, tin plating, soldermask, acid and alkaline cleaning, scrubbing, developing, resist stripping, tin stripping, permanganate etching, cupric chloride etching, ammonia etching, Circubond (black oxide) and miscellaneous cleanup/mopwater. Winonics operates a continuous treatment system with pH adjustment, flocculation, clarification, and solids dewatering with a filter press. Winonics also operates a batch treatment system for acidic solutions and rinses. Resist stripper solutions, developer solution and all final rinses discharges directly to the sample point without treatment. Winonics also discharges aqueous fume scrubbing, R.O. reject to the sample point.

July 1 – December 31, 2021

On October 11, 2021, Winonics had a copper violation for which an NOV was issued on December 9, 2021. OC San conducted a compliance inspection on December 13, 2021, to investigate the cause of this

violation. During the inspection, OC San collected an informational sample from the discharge from the clarifier, which showed an elevated level of copper. As a corrective action, Winonics increased the dosage of the coagulant and metal precipitant to increase the effectiveness of treatment. Additionally, Winonics also identified that there was insufficient air pressure of the air knives on their cupric etchant line. Winonics increased the air pressure to decrease the amount of drag out that discharges to the clarifier. A resample of the wastewater showed compliance.

January 1 – June 30, 2022

On March 16, 2022, Winonics had a violation of the copper instantaneous limit, for which an NOV was issued on April 12, 2022. On April 12, 2022, Winonics informed OC San that they suspect that there was an issue with the dosing of the metal precipitant. On April 21, 2022, Winonics provided a root cause analysis and corrective action report in response to the violation. Winonics attributed the violation to insufficient dosing of the polymer and coagulant. As a corrective action, Winonics installed an additional polymer dosing pump, changed the ORP setpoint for the metal precipitant and increased cleaning frequency of the lamella clarifier. OC San conducted a compliance inspection May 11, 2022 to review the modifications and collected additional informational samples to evaluate clarifier capacity. On May 11, 2022, Winonics had another violation of their copper instantaneous limit, for which an NOV was issued on June 23, 2022.

OC San will continue enforcement actions during the next reporting period and will continue to monitor Winonics' discharge and compliance status on a quarterly basis.

Chapter 5. Pretreatment Program Staffing, Costs, and Field Equipment

5.1 Introduction

This chapter discusses the pretreatment program's staffing levels, program costs, payments to OC San by permittees, and equipment used by the program.

5.2 Staffing, Revenues, and Costs

5.2.1 Staffing

The Resource Protection Division, a part of OC San's Environmental Services Department, includes all the pretreatment program staff. Dedicated pretreatment staff for FY 2021/22 consists of one manager, three supervisors, nine engineers, four environmental specialists, 10 field inspectors, three field technicians, and seven administrative support personnel for a total of 37 staff members.

5.2.2 Revenues

During FY 2021/22 a total of \$18,378,136.63 in revenue payments were made to OC San by Class I, Class II, Wastehauler, Special Purpose Discharge and FOG FSE permittees. The following amounts were collected for the discharge of wastewater, biochemical oxygen demand, and suspended solid pollutants. Operation and maintenance (O&M) fees totaled \$12,604,807.74, Supplemental Capacity Facilities Capacity Charge (SCFCC) fees totaled \$4,105,200.15, and wastehauler user fees totaled \$1,069,378.75. Permit fees in the amount of \$516,257.99 were collected, and over \$82,492.00 in noncompliance fees and penalties issued. Due to a change in OC San's Financial Management Division's accounting practices, the O&M and SCFCC fees represent the prior fiscal year, FY 2020/21 and an estimate of FY 2021/22.

The revenue collected offsets a portion of OC San's treatment costs and the \$5,334,568 needed to administer the pretreatment program, including labor, supplies, equipment, and other overhead. These costs are associated with issuing permits, sampling, inspections, and laboratory analyses.

5.2.3 Program Costs

Overall pretreatment program implementation costs (including overtime) during the fiscal year decreased 19.5% over the preceding year and show an 11.7% decrease from the program costs of five years ago. The cost per labor hour over the past five years has decreased 12.3%, which is an average of 2.5% per year decrease. Much of the decrease can be attributed to loss of senior and tenured staff starting at the ending of FY 2019/20 and continuing into this year. A comparison of pretreatment program costs for the past five years is shown in Table 5.1.

FY	Total Cost	Labor Hours	Cost per Labor Hour
2017-18	\$6,044,009	69,606	\$86.83
2018-19	\$7,406,407	72,646	\$101.95
2019-20	\$7,206,630	71,355	\$101.00
2020-21	\$6,630,445	68,713	\$96.49
2021-22	\$5,334,568	70,082	\$76.12

5.3 Field Equipment

5.3.1 Equipment Inventory

An inventory of major equipment used by OC San inspection staff for the Resource Protection Division is shown in Table 5.2. There are 13 field staff each utilizing trucks and modern sampling equipment to maintain a high degree of visibility in the industrial community.

Table 5.2. Current Inventory of Major Equipment for the Pretreatment Program, Fiscal Year 2021/22 Orange County Sanitation District, Resource Protection Division	
Description	Quantity
Vehicles	12
Equipment	
Cellular phones	13
Laptop computers	13
Composite samplers – general use	43
Composite samplers – special purpose	16
Portable sample pumps	9
pH meters – portable	16
Gas meters	26

Chapter 6. Pretreatment Program Status

6.1 Introduction

OC San administers several different program elements designed to meet the goal of controlling discharges from industrial and non-industrial sources. These have a direct influence on OC San's ability to meet ocean discharge, biosolids reuse, and water reclamation requirements. This chapter outlines those program elements designed to enforce and enhance the federally-approved Pretreatment Program including, industrial discharger public participation, wastehauler monitoring, industrial inspection and sampling, quality assurance/quality control, Total Toxic Organic (TTO) waivers, Special Purpose Discharge Permits, self-monitoring, and industrial operations and maintenance improvement.

6.2 Public Participation

A provision of 40 CFR 403.8 is to comply with the public participation requirements of 40 CFR Part 25 in the enforcement of National Pretreatment Standards. These procedures shall include provision for at least annual public notification in the newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by OC San, of industrial users which, at any time during the previous 12 months, were in significant noncompliance with applicable pretreatment requirements. This public notice is shown in Appendix E.

6.3 Wastehauler Program

OC San operates a dedicated discharge station at Reclamation Plant No. 1 for the disposal of septage, chemical toilets, brine, cesspool, and non-industrial food service establishment (FSE) grease interceptor wastes collected by independent wastehaulers. The discharges are transferred via a major interplant sewer to Treatment Plant No. 2 for treatment. OC San Treatment Plant No. 2 has a back-up discharge station used during Plant No. 1 service interruptions. The following sections provide the status of wastehauler permitting, discharges and monitoring conducted during FY 2021/22. Values provided in the tables are derived primarily from manifests provided by the wastehauler companies.

6.3.1 Wastehauler Permitting

A liquid wastehauler must first register with the Orange County Health Care Agency (OCHCA) and have all vehicles that intend to discharge at OC San inspected by OC San staff to obtain a wastehauler permit from OC San. Numerical decals issued by both OCHCA and OC San are affixed to all permitted vehicles. These decals aid in the identification of authorized dischargers. Permits include but is not limited to rules for use of the wastehauler station and enforcement for violations. Wastehaulers must conduct their business using methods to reduce or eliminate odors. During FY 2021/22, 44 wastehauler companies were under permit with OC San, with a total of 152 vehicles.

6.3.2 Wastehauler Discharges

During the past fiscal year 11.6 million gallons (MG) of waste was discharged by permitted wastehaulers at the OC San Wastehauler Station. The volume of waste accepted at the station was 16% higher than the volume received during FY 2020/21. The number of loads received increased 19% from FY 2020/21. As of January 18, 2016, OC San started using a new pretreatment software and database (iPACS), which allows for more accurate tracking and calculation of discharged volumes. The reported volume for FY 2017/18 through FY 2021/22 considers the self-reported volumes, instead of the maximum capacity volumes reported in previous years, which assumed all received tanks were full. Wastehauler discharge data for the last five years is summarized in Table 6.1.

Table 6.1 Summary of Wastehauler Loads and Volume Discharged into Plant No. 1 Disposal Station, Fiscal Years 2017/18-2021/22 Orange County Sanitation District, Resource Protection Division		
FY	Loads Delivered	Volume Waste Received (MG)
2017-18	4,844	12.1 ¹
2018-19	8,127	13.2 ¹
2019-20	8,467	12.6 ¹
2020-21	6,675	10.0
2021-22	7,940	11.6
¹ Volume is based on wastehauler self-reported volumes		

Wastehauler loads are classified into five types of waste: brine, cesspool, chemical toilets, non-industrial food service establishment (FSE) grease interceptor waste (i.e., restaurant grease trap waste), and septic tanks. The total volumes and number of loads for each type of waste are summarized in Table 6.2.

Table 6.2 Summary of Wastehauler Load Types Discharged into Plant No. 1 Disposal Station, Fiscal Year 2021/22 Orange County Sanitation District, Resource Protection Division			
Load Type	Loads Delivered	Waste Received (MG)	% Waste Received
Brine	1	1,100	0.04%
Cesspool	34	57,600	0.01%
Chemical toilet	4,837	6,758,251	0.50%
FSE grease	2,346	3,780,420	58.36%
Septic tank	717	979,796	32.64%
Other	5	4,100	8.46%
All Types Total	7,940	11,581,267	100%

During the past fiscal year 3.78 million gallons of FSE grease was discharged by permitted wastehaulers at OC San's Wastehauler Station. This represents a 23% increase from the volume of grease discharged during FY 2020/21. The five-year trend for grease is presented in Table 6.3.

Table 6.3 Summary of Wastehauler Grease Wastewater Loads into OC San's Disposal Station, FY 2017/18-2021/22 Orange County Sanitation District, Resource Protection Division		
FY	Loads Delivered	Volume (MG)
2017-18	3,100	5.80
2018-19	2,939	5.40
2019-20	2,672	4.65
2020-21	1,924	3.08
2021-22	2,346	3.78

6.3.3 Wastehauler Monitoring

Random sampling of wastehauler loads is conducted to verify compliance with OC San discharge limits. During FY 2021/22, the contents of 946 wastehauler vehicles (15.7% of all loads received) were sampled and 5,676 metal analyses were performed. The results of the sampling included 29 metal violations in 946

loads that originated from either domestic sources or grease hauling. This represents a 3.07% violation rate of the total samples taken and analyzed. The violations included 16 copper, one nickel, and 12 zinc concentration exceedances. Some of the actions taken by OC San as a response to these violations included generator verifications and inspections, investigations, NOV letters, and compliance meetings.

6.4 Inspection and Sampling

OC San schedules sampling and inspection of each Class I industry on a quarterly basis, and samples select Class II industries periodically. Permittees are sampled for metals, cyanide, organics, pH, oil and grease, biochemical oxygen demand (BOD), and suspended solids (SS). Inspections are conducted before and/or after each 24-hour composite sampling event, at the time of collecting a grab sample, and to determine compliance with other provisions of the Ordinance.

6.5 Quality Assurance and Quality Control (QA/QC) Activities

6.5.1 QA/QC Program Tasks

The objective of the QA/QC program is to ensure that all field sampling and monitoring is accurate and performed in accordance with Resource Protection Division's adopted policies and procedures. The QA/QC program includes the following components.

Equipment Blank – Composite samples of deionized water are collected monthly to evaluate the cleaning procedures and storage of automatic sampling equipment.

Archive Sample Check – Archived heavy metal samples are analyzed monthly, several months after collection, to evaluate the effects of sample storage conditions and whether those conditions impose analyte degradation or contamination.

Sample Collection Check – Duplicate composite samples are collected quarterly to evaluate the precision of the sample collection and preservation methods.

Trip-Blank Evaluation – Samples made up of reagent water are collected to measure the potential contamination of US EPA Method 624 samples during transport and storage.

Sample Collection and Inspection Audit – Periodic reviews are conducted to assure that inspectors conform to existing guidelines for inspection and sample collection, and that existing procedures continue to ensure representative data. Document reviews are completed to assess overall inspector performance.

During FY 2021/22, 72 composite samples were analyzed for equipment blank verification, 48 archived samples were analyzed for comparison against previous analytical results, 100 composite samples were analyzed from industrial discharges to audit collection methods, and 12 trip blank samples were analyzed to verify the effectiveness of the transportation and storage methods of volatile organic compound samples. The test results for QA/QC samples collected are detailed in Appendix I. The overall results show that the procedures and their implementation for the collection of field samples are adequate to assure sample quality and consistency.

Calculation Methods

Equipment blank sampling is performed to find any concentration above the reporting limit (RL). Any detectable amount is considered an indicator of possible contamination in the deionized water supply, detergent, containers, storage, or other sources. The number of times a metal is detected above the RL is tracked.

Methods for calculating deviations were refined beginning with data generated during 2005 to be more consistent with accepted laboratory standards for quality control. The prior use of Pretreatment Standards for Existing Sources (PSES) discharge limits to calculate percent deviations for duplicate samples has been

replaced with the relative percent difference (RPD) formula found in Standard Methods for the Examination of Water and Wastewater (Standard Methods)¹.

Precision among duplicate samples is important for the archive samples and sample collection checks. The following metrics were determined based on the nature of the samples normally collected and the variables with matrix effects anticipated. The precision of low-level duplicates, with concentrations less than 20 times the RL is $\pm 25\%$ RPD. The precision of high-level duplicates, with concentrations greater than 20 times the RL is $\pm 20\%$ RPD. These guidelines are used to present and calculate the archive sample data in the tables below. If the average of the two duplicate samples is greater than 20 times the RL, then the more restrictive limit of 20% is used to evaluate precision. Additionally, per Standard Methods, values where the average is below five (5) times the RL are not used for the RPD calculation.

A study conducted in 2009, including a review of relevant literature and OC San data, confirmed that silver is relatively unstable under standard preservation and storage conditions, and cannot be used to evaluate precision and accuracy with the other metals listed below in archive samples. Consequently, silver has been removed from the list of metals used to evaluate precision and accuracy.

The current RLs used by OC San's laboratory during FY 2021/22 are listed in Table 6.4 below. These reporting limits are used in calculations in tables where RLs appear.

6.5.2 QA/QC Sampling Results

Evaluation of Equipment Blank Sampling Results

To check for contamination of sampler and field equipment, two composite samples are collected each month using clean, randomly chosen automatic samplers. The two samplers are set at the Source Control Inspection group's technician room in a controlled setting to run a composite sampling program to collect samples from a deionized water supply. The equipment blank samples are composited and preserved in the same manner as compliance samples collected at permitted facilities. Each sampler's composite is split into three equal volumes, preserved, then submitted to and analyzed individually by OC San's laboratory for heavy metal constituents.

The results of this study are summarized in Table 6.4. The statistics presented below show that 100% of the analyses (432 of 432 analyses) are at or below the heavy metal constituents RL.

Table 6.4 Equipment Blank Sampling Results, Fiscal Year 2021/22 Orange County Sanitation District, Resource Protection Division					
Constituent	RL (mg/L)	Analyses at or Below RL		Analyses Above RL	Total Avg. Deviation
		No. of Analyses	Percentage	No. of Analyses	
Cadmium	0.02	432	100	0	0
Chromium	0.02	432	100	0	0
Copper	0.02	432	100	0	0
Nickel	0.02	432	100	0	0
Lead	0.02	432	100	0	0
Zinc	0.02	432	100	0	0
Summaries					

¹ Standard Methods for the Examination of Water and Wastewater 23rd Edition. Part 1020-B, Section 12, Subsection f, entitled "Duplicate sample" (pg. 1-11)

The RL for zinc was increased from 0.02 to 0.10 mg/L on July 1, 2021. Zinc is a common contaminant and present in dust; OC San continues to review equipment maintenance and storage procedures to try to minimize this low concentration contamination.

Evaluation of Archived Samples

Archived samples are submitted to OC San’s laboratory to evaluate the effects of sample splitting and storage techniques. The results of the archive sample analysis are compared with the original sample results and the RPD is calculated for each metal. Results at or below the RL are calculated as equal to the RL.

Statistics on the archived samples and RPD are summarized in Table 6.5. Of the 288 comparisons performed on 96 samples (48 archived samples and 48 original samples), 99.7% of the results were within the acceptable RPD.

Table 6.5 QA/QC Evaluation of Archived Samples, Fiscal Year 2021/22 Orange County Sanitation District, Resource Protection Division				
Constituent	Comparisons within acceptable RPD	Comparisons outside acceptable RPD	Percent within acceptable RPD	Average RPD (%)
Cadmium	96	0	100	2
Chromium	96	0	100	6
Copper	95	1	99	5
Nickel	95	1	99	5
Lead	96	0	100	1
Zinc	96	0	100	5
Summaries	576	574	99.7	4

A review of archive sample handling procedures took place during FY 2021/22, and a new procedure for storing sample archives is planned to be implemented on January 1, 2023.

Sample Collection Checks

Two composite samplers collected 20 samples each quarter to verify the precision of the sample collection methods. In this study, two automatic samplers are installed adjacent to each other at a single industrial sample point to collect one composite sample from each sampler. Each composite sample is split into ten duplicate portions. Five duplicates from each sampler are analyzed by OC San’s laboratory for heavy metals (HM) and five are analyzed for total suspended solids (TSS).

The results for each constituent are evaluated by calculating the RPD for each group of metals. Values that exceed the accepted deviations for metals and TSS are investigated, and where causes are identified, corrective actions are taken. This comparison is used to confirm that the sample location is appropriate, that the samplers are maintained and are functioning properly, and that the sample-splitting techniques are effective.

The statistics on the collection check samples and the sampler average deviations are summarized in Table 6.6. The comparisons show acceptable agreement both among the samples within the sampler and between the samplers at the site.

Table 6.6 QA/QC Collection Check Samples and Sampler Average Deviations, Fiscal Year 2021/22 Orange County Sanitation District, Resource Protection Division								
Qtr.	Location	Average Deviations						TSS
		Cadmium	Chromium	Copper	Nickel	Lead	Zinc	
1	Sampler A	0.00	0.04	0.00	0.07	0.00	0.00	61.6
	Sampler B	0.00	0.05	0.00	0.08	0.00	0.02	61.2
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	0.65
2	Sampler A	0.00	0.00	0.02	0.00	0.00	0.11	7.20
	Sampler B	0.00	0.00	0.02	0.00	0.00	0.12	5.90
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	19.85
3	Sampler A	0.00	0.04	0.02	0.04	0.00	0.28	68.2
	Sampler B	0.00	0.04	0.02	0.04	0.00	0.28	60.8
	Site RPD (%)	0.00	0.00	0.00	0.00	0.00	0.00	11.47
4	Sampler A	0.00	0.13	0.04	0.00	0.00	0.12	3.76
	Sampler B	0.00	0.12	0.04	0.00	0.00	0.00	3.42
	Site RPD (%)	0.00	6.07	0.00	0.00	0.00	0.00	0.00
Avg	Site RPD	0.00	6.07	0.00	0.00	0.00	0.00	10.66
All results are in units of sampler average deviation. TSS = total suspended solid								

The variation between samples at the same site were within appropriate ranges, indicating acceptable sample splitting. Results of all four quarterly Collection Check comparisons were within the acceptable Site RPD which indicates acceptable sample splitting techniques are used. Collection check procedures are currently being evaluated and staff will be notified of any changes if necessary.

Trip Blank Evaluation for US EPA Method 624 Analysis

Inspectors perform this study monthly. Containers prepared with reagent water are obtained from OC San's laboratory and are carried by inspectors with other samples during their workday. The containers are returned to the lab and analyzed for volatile organics. Twelve trip blanks were analyzed for volatile organics using US EPA Method 624. All twelve US EPA Method 624 trip blanks were below reporting limits.

Sample Collection and Inspection Audit

During FY 2021/22, the source control supervisor audited the sample collection and inspection procedures of individual inspectors. The audit of each inspector was accomplished by document review during performance evaluations. Opportunities for improvement were discussed with individual inspectors during their mid-year and annual performance reviews.

6.5.3 QA/QC Conclusions

The following findings support the general conclusion that the sampling procedures are being followed and that the samples are representative and free of contamination.

- Results of the equipment blank evaluation demonstrate that 100% of the equipment blank samples have concentrations at or below the heavy metal reporting limits.
- Results of the archive sample evaluation demonstrate that 99.7% of the archive samples were within the acceptable percent deviation range.

- The sample collection check results show good agreement for heavy metals among split samples for each sampler as well as between samplers at the same site. The sample locations and sample-splitting methods are adequate to provide representative samples for heavy metals.

All twelve US EPA Method 624 trip blanks were below reporting limits. Trip blanks were analyzed for volatile organics using US EPA Method 624.

6.6 Total Toxic Organics Waiver Program

Permittees subject to federal categorical standards were first notified of OC San's Total Toxic Organics (TTO) waiver program requirements on July 27, 1987. The current TTO waiver program is summarized below.

- Categorical permittees who are required to conduct self-monitoring for TTOs must collect composite samples at least semiannually. In accordance with OC San's Ordinance, the composite sample is obtained by analyzing the grab samples and compositing the results mathematically.
- Permittees that have not shown detectable levels of TTOs based on their wastewater discharge data for at least one year are eligible to waive the self-monitoring requirement if they certify that TTOs are not used or present in the industrial wastewater discharge at their facility. The wastewater discharge data used in evaluating eligibility for this waiver includes data for samples obtained by OC San during routine monitoring and the self-monitoring results obtained by the permittee. The evaluation of wastewater discharge to determine the permittees that are eligible for this waiver is conducted in December and June of each year. See Table 6.7 for those permittees that have successfully applied for a waiver. To be eligible for a waiver the permittee must satisfy all of the following criteria:
 - Permittee must demonstrate sampling results with TTO concentrations less than or equal to 0.05 mg/L for the monitoring period being considered.
 - Permit must have an initial permit issue date that is prior to the start of the baseline monitoring period being considered.
 - Submission of a Toxic Organic Management Plan (TOMP) that is accepted by OC San.
- Subsequently, permittees who have a TTO self-monitoring waiver, renew their Certification of Non-Use of TTOs semiannually during the application period, otherwise the waiver for the upcoming period is not approved. Issuance of a waiver does not constitute elimination of the self-monitoring requirement from the permit but provides a temporary discontinuance or suspension of the requirement as approved by OC San.
- The self-monitoring requirement waiver for any permittee is cancelled if sampling results from the permittee's self-monitoring or OC San's sampling demonstrate TTO concentrations above the 0.05 mg/L threshold. For these cases, the requirement to conduct self-monitoring at least twice per year is immediately reinstated.
- Newly permitted categorical users required to self-monitor will not be allowed to waive the self-monitoring requirement until meeting TTO reporting and waiver requirements for at least one year.

Table 6.7 Permittees with TTO Waivers July 1, 2021 – June 30, 2022			
Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-531422	A & G Electropolish	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021088	A & R Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011138	Accurate Circuit Engineering	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011115	Active Plating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022

Table 6.7 Permitees with TTO Waivers July 1, 2021 – June 30, 2022 Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-021389	Advance-Tech Plating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-531404	Air Industries Company, A PCC Company (Knott)	Metal Finishing PSNS, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2021 - Jun 30, 2022
1-031110	All Metals Processing of O.C., Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011073	Allied Electronics Services, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011036	Alloy Tech Electropolishing, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521798	Andres Technical Plating	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600295	AnoChem Coatings	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-511389	Anodyne, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011155	Anomil Ent. Dba Danco Metal Surfacing	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600689	APCT Anaheim	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600503	APCT Orange County	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021192	ARO Service	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-571295	Astech Engineered Products (1)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-071037	Aviation Equipment Processing	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-031094	Basic Electronics, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521824	Beckman Coulter, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-511370	Beo-Mag Plating	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021213	Black Oxide Industries, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-111018	Boeing Company (Graham)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600316	Brasstech, Inc	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021226	Bristol Industries	Aluminum Forming PSNS, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jan 01, 2022 - Jun 30, 2022
1-521770	Burlington Engineering, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-021062	Cadillac Plating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-111089	Cal-Aurum Industries, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021189	Central Powder Coating	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-511414	Chromadora, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521821	Circuit Technology, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-111129	Coast to Coast Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600708	Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021290	Continuous Coating Corporation	Coil Coating PSNS, Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600920	CP-Carrillo, Inc. (Armstrong)	Metal Finishing PSNS	Jan 01, 2022 - Jun 30, 2022
1-021289	Crest Coating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021297	Custom Enamellers, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022

Table 6.7 Permitees with TTO Waivers July 1, 2021 – June 30, 2022 Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-011142	Data Electronic Services, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521761	Data Solder, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-601023	Dunham Metal Plating Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021325	Dunham Metal Processing	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011064	EFT Fast Quality Service, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021158	Electro Metal Finishing Corporation	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-511376	Electrode Technologies, Inc. dba Reid Metal Finishing	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-071162	Electrolurgy, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021336	Electron Plating Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021337	Electronic Precision Specialties, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600456	Embee Processing (Anodize)	Electroplating PSES, Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-600457	Embee Processing (Plate)	Electroplating PSES, Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021121	Fineline Circuits & Technology, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021352	Gomtech Electronics, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-021286	Harbor Truck Bodies, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521790	Hi Tech Solder	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021185	Hightower Plating & Manufacturing Co.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-061115	Hixson Metal Finishing	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021081	Howmet Global Fastening Systems Inc.	Aluminum Forming PSES, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jan 01, 2022 - Jun 30, 2022
1-021041	Ideal Anodizing, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521756	Ikon Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600243	Integral Aerospace, LLC	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-511407	JD Processing, Inc. (East)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021171	Kenlen Specialities, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021428	Kryler Corporation	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600338	Lightning Diversion Systems LLC	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-511361	LM Chrome Corporation	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-031049	Logi Graphics, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-531391	Magnetic Metals Corporation	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521811	Murrietta Circuits	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-571292	Newport Fab, LLC dba Tower Semiconductor Newport Beach, Inc.	Electrical And Electronic Components PSNS	Jul 01, 2021 - Jun 30, 2022

Table 6.7 Permitees with TTO Waivers July 1, 2021 – June 30, 2022 Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-521801	Nobel Biocare USA, LLC	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021520	Omni Metal Finishing, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-600981	Omni Metal Finishing, Inc. (Building 4)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021070	Pacific Image Technology, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521805	Performance Powder, Inc.	Metal Finishing PSNS	Jan 01, 2022 - Jun 30, 2022
1-011262	Pioneer Circuits, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521852	Platinum Surface Coating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600167	Powdercoat Services, LLC (Bldg E / Plant 1)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600168	Powdercoat Services, LLC (Bldg J / Plant 3)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600355	PowderCoat Services, LLC. Plant 5	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011265	Precious Metals Plating Co., Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521809	Precision Anodizing & Plating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011008	Precision Circuits West, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600337	Q-Flex Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011013	RBC Transport Dynamics Corp.	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-021187	Rigiflex Technology, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-061008	Sanmina Corporation (Airway)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-061009	Sanmina Corporation (Redhill)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021016	Santana Services	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-031311	Scientific Spray Finishes, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600297	Shur-Lok Company	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-031341	Soldermask, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-011069	South Coast Circuits, Inc. (Bldg 3500 A)	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-011030	South Coast Circuits, Inc. (Bldg 3506 A)	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-511365	South Coast Circuits, Inc. (Bldg 3512 A)	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-011054	South Coast Circuits, Inc. (Bldg 3524 A)	Metal Finishing PSNS	Jul 01, 2021 - Dec 31, 2021
1-511381	SPS Technologies LLC, DBA Cherry Aerospace	Aluminum Forming PSNS, Metal Finishing, Nonferrous Metals Forming And Metal Powders PSNS	Jul 01, 2021 - Jun 30, 2022
1-021672	Stainless Micro-Polish, Inc.	Metal Finishing PSNS	Jan 01, 2022 - Jun 30, 2022
1-531425	Star Powder Coating, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021664	Statek Corporation (Main)	Electrical And Electronic Components PSES, Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022

Table 6.7 Permitees with TTO Waivers July 1, 2021 – June 30, 2022 Orange County Sanitation District, Resource Protection Division			
Permit No.	Facility Name	Federal Categories	Waiver Period
1-521777	Statek Corporation (Orange Grove)	Electrical And Electronic Components PSNS	Jul 01, 2021 - Jun 30, 2022
1-600012	Summit Interconnect, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-600060	Summit Interconnect, Inc., Orange Division	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021090	Superior Plating	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021403	SUPERIOR PROCESSING (1)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-031012	Tayco Engineering, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021123	Taylor-Dunn Manufacturing Company	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021282	Thermal-Vac Technology, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-111132	Tiodize Company, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021202	Transline Technology, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-141163	Tropitone Furniture Co., Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521859	TTM Technologies North America, LLC. (Coronado)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-511366	TTM Technologies North America, LLC. (Crodgy)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-511359	TTM Technologies North America, LLC. (Harbor)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-521836	Universal Molding Co.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-031035	Winonics (Brea)	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022
1-021735	Winonics, Inc.	Metal Finishing PSNS	Jul 01, 2021 - Jun 30, 2022

6.7 Special Purpose Discharge Permit Program

A special purpose discharge permit (SPDP) is issued by OC San for water and wastewater discharges to the sewerage system when no alternative discharge point exists other than the sewer system and/or considered alternate discharge methods pose an environmental impact or threat.

Wastewater discharges may include: 1) temporary facilities and projects such as groundwater cleanup and construction dewatering, 2) short-term or one-time water and wastewater discharges, 3) surface run-off from areas associated with an industrial or commercial facility.

6.7.1 SPDP Metrics and Trends

During FY 2021/22, 6 new SPDPs were issued, of which two expired; of the active SPDPs, four existing SPDPs were voided before expiration at the request of the permittees, and one SPDP was not renewed by the permittee upon expiration. During the fiscal year, there were 51 active SPDPs, a decrease from the previous fiscal year, but with only 40 remaining active by the end of the fiscal year. Active SPDPs are renewed every two years.

The majority of the new SPDPs issued during FY 2021/22 were for short-term construction dewatering activities (i.e., typically less than a year). Formerly, the most common special purpose permitted facilities were gasoline service stations that required remediation of contaminated groundwater. Other discharges affected include mobile cleaners, water features (e.g., pools), water-well purging disinfection, subsurface parking structure dewatering, etc.

OC San staff continues to work with outside agencies such as SARWQCB, OCHCA, and the cities within Orange County to both coordinate and offer guidance on the SPDP issuance process and OC San's Ordinance.

6.7.2 SPDP Program Enforcement

For FY 2021/22, the Orange County Flood Control District (OCFCD) failed to perform an effluent meter calibration and submit the report to OC San in accordance with permit requirements. On March 10, 2021, OC San issued a compliance requirement letter requiring OCFCD perform an effluent meter calibration and submit an effluent flow meter calibration report. At this time, OCFCD has failed to propose an acceptable method to perform the effluent meter calibration and OC San will continue enforcement during the next reporting period.

6.7.3 SPDP Regulatory Program

OC San staff minimizes SPDP impacts to OC San Reclamation Plant No. 1 and Treatment Plant No. 2 by diverting noncompatible discharges from Reclamation Plant No. 1 to Treatment Plant No. 2, coordinating more closely with Operations, Engineering and Safety on significant one-time discharges, requiring pretreatment for projects which may encounter known contaminated underground plumes, requiring best management practices for small nuisance dischargers, and requiring significant construction dewatering dischargers to stop discharging during a rain event.

6.8 Self-Monitoring Program

OC San operates an extensive self-monitoring program, which is an integral part of the Resource Protection Division's monitoring and enforcement programs. OC San's self-monitoring program exceeds the minimum requirements of 40 CFR 403. To obtain a broad perspective of a permittee's discharge quality and adequately determine their compliance status, OC San takes a proactive approach to self-monitoring (per US EPA recommendation) by requiring frequent sampling in most cases. OC San determined that sampling quarterly, or semi-annually is an effective method to generate sufficient data to make a fair determination of a permittee's compliance status, and balance the need for data against the related costs incurred by permittees. In addition, these sampling frequencies preclude permittees from being unduly classified as dischargers in SNC for isolated process upsets.

OC San's self-monitoring program is largely automated with self-monitoring results submitted on OC San's standardized self-monitoring report (SMR) forms. These forms are computer generated with unique SMR numbers that allow tracking and automatic generation of reminders, late and incomplete notices, violation notices with resample forms, and SNC notices. This tracking system has enabled OC San to ensure that permittees comply with self-monitoring requirements.

6.9 Industrial Operations and Maintenance Improvement Program

To remain a vital part of the community, help businesses and industries in OC San's service area maintain compliance, and to enable OC San to attain its environmental goals, OC San established an Industrial Operations and Maintenance Improvement Program. The program serves as both a resource for industry and a forum for discussing methods to carry out environmental requirements. The program consists of outreach and education, which includes publications addressing pretreatment program elements, such as permitting, compliance and pollution prevention, OC San staff presence at educational events and fairs, and OC San-sponsored training opportunities.

Industrial Operations and Maintenance Improvement Program

The ongoing trend in industrial permittee discharge violations have shown that most cases are due to inadequate operations and maintenance of industry's pretreatment systems as well as industrial operator error. This was recognized when US EPA audit findings of 1998 recommended that OC San develop and implement an industrial operations and improvement program. In 1999/2000, OC San developed a plan that included outreach and operator training, and enforcement of requirements for operator and operations and maintenance practices which is still in effect today.

In 2019, OC San conducted a comprehensive training course for industrial wastewater treatment (pretreatment) operators currently employed by facilities holding a Class I wastewater discharge permit. The course was conducted by an engineering services company (selected via bid process for a five-year contract in 2019). OC San provided this training, free of charge, to assist permittees to obtain and retain a qualified pretreatment operator and to reduce or eliminate noncompliance due to operation and maintenance and/or operator problems. The training course consisted of five 4.5-hour classes and a follow-up wastewater audit at the operator facility to ensure proper implementation of operation and maintenance practices. Those that attended the classes, passed the exam and quizzes, and successfully fulfilled the audit requirements, received certificates of completion. The course has been on hold due to the current pandemic.

6.10 Annual Technical Review of Local Limits

OC San develops local limits in accordance with 40 CFR 403.5(c)(1) to ensure protection of its workers and treatment facilities, to prevent pass through and interference, and to enable reclamation opportunities. OC San's existing local limits remain unchanged from the 2015 Technical Evaluation of Local Limits (TELL). However, OC San periodically reviews and revises its local limits to respond to changes in treatment plant infrastructure and operations, regulations, wastewater characteristics, or industrial user (IU) discharge. While TELL is a comprehensive assessment to develop local limits using three to five years' worth of historical data, a technical review of local limits (TRLL) focuses on verifying whether the existing local limits are protective of the OC San's POTW, its workers, reclamation opportunities, and the environment using recent data. OC San's NPDES permit requires validation of existing local limits annually ahead of its next TELL. This section reports findings from the TRLL.

In October 2021, OC San compared actual FY 2020/21 influent loadings for individual pollutants of concern to maximum allowable headworks loadings (MAHLs) and maximum allowable industrial loadings (MAILs) calculated during the 2015 TELL. The TRLL evaluated the ratio of FY 2020/21 MAHL to FY 2014/15 Universal MAHL and FY 2020/21 MAIL to FY 2014/15 MAIL, respectively. As presented in Table 6.8, this ratio represents the percentage change of loading received at OC San.

Table 6.8 October 2021 Technical Review of Local Limits Orange County Sanitation District, Resource Protection Division		
Pollutant of Concern	FY 2020/21 Max Influent Loading	FY 2020/21 Max Industrial Loading
	FY 2014/15 Universal MAHLs (%)	FY 2014/15 MAILs (%)
1,4-Dioxane	33.63	5.22
5-day Carbonaceous Biochemical Oxygen Demand (CBOD ₅)	83.45	27.80
Ammonia	33.48	5.72
Arsenic	27.48	3.78
Cadmium	22.54	2.79
Chromium (Total)	0.38	0.05
Copper	49.98	7.92
Cyanide (Total)	3.46	0.44
Lead	6.21	0.77
Mercury	4.24	0.53
Molybdenum	22.83	2.98
Nickel	13.31	1.68
Pesticides	*	*
Oil and Grease of Mineral or Petroleum Origin	*	*
PCBs	*	*
Selenium	22.68	2.77
Silver	0.06	0.01

Table 6.8 October 2021 Technical Review of Local Limits Orange County Sanitation District, Resource Protection Division		
Pollutant of Concern	FY 2020/21 Max Influent Loading	FY 2020/21 Max Industrial Loading
	FY 2014/15 Universal MAHLs (%)	FY 2014/15 MAILs (%)
Sulfide (Dissolved)	*	*
Sulfide (Total)	*	*
Zinc	29.51	4.60

* Per OC San's 2015 TELL technical memoranda, MAHL and MAIL are unnecessary for the regulatory and inhibitory limitations that apply to plant influents at the headworks or in the sewer collection systems. Best professional judgement limits are used instead.

As recommended by EPA's *Local Limits Development Guidance*, OC San employs a ratio threshold of 60% (80% for CBOD₅) to consider revising its local limits. When a constituent loading ratio exceeds a threshold, OC San considers one or a combination of the following actions: (1) establish or revise a pollutant local limit, (2) investigate the cause of elevated loading, (3) increase IU monitoring and (4) consider undertaking pollution prevention measures.

The FY 2020/21 TRLL indicates that only CBOD₅ exceeds the action triggering threshold. CBOD₅ is a conventional pollutant whose allowable loadings are more dependent on OC San's treatment plant capacity than loading from industrial users; CBOD₅ does not represent a risk of pass-through to OC San because there is enough reserve to reliably and properly treat CBOD₅ to consistently meet NPDES discharge limits. For all other pollutants of concern, the local limits seem to be adequately protective of the OC San's POTW, its workers, reclamation opportunities, and the environment.

Pursuant to 40 CFR 122.44(j)(2)(ii), federal regulations require a written technical evaluation of the existing local limits following each permit issuance or re-issuance. In accordance with OC San's NPDES permit, OC San will commence its next TELL project following completion of the GWRS Final Expansion.

6.11 Significant Changes in Operating the Pretreatment Program

There were no significant changes to the OC San Pretreatment Program during FY 2021/22.

Chapter 7. Interaction with Other Agencies

7.1 Introduction

OC San has entered into agreements and has developed memoranda of understanding (MOUs) with Los Angeles County Sanitation District (LACSD) Nos. 18 and 19, Irvine Ranch Water District (IRWD), and the Santa Ana Watershed Project Authority (SAWPA) for accepting certain wastewater flows and implementing source control discharge, inspection, and enforcement requirements. Therefore, this chapter is divided into three sections: Section 7.2 presents information on LACSD for FY 2021/22, Section 7.3 presents information on IRWD for FY 2021/22, and Section 7.4 presents information on SAWPA for FY 2021/22.

7.2 Los Angeles County Sanitation District Nos. 18 and 19 Flow Accommodation Agreement

In 1960, LACSD and County Sanitation District No. 3 of Orange County² entered into a flow accommodation agreement by which each district agreed to receive wastewater from the other district, where the wastewater originated in one district's service area and discharged into the other district's sewerage system. The geographic areas subject to the agreement are located along the Los Angeles County-Orange County boundary, and are characterized by the fact that they are physically isolated from the sewer system of their respective district's jurisdiction by Coyote Creek. The districts entered into subsequent flow accommodation agreements for the 2010/11 and 2011/12 fiscal years. A current agreement was approved by the Board of Directors of both LACSD and OC San on July 1, 2012.

The flow accommodation agreement is fee-based, focusing primarily on residential parcels and flows. For the few industrial dischargers, the fees are based on flow, biochemical oxygen demand, chemical oxygen demand, and suspended solids. The originating district is responsible for administering and enforcing its industrial waste pretreatment program for industries in its service area, with terms and conditions of coordination and information exchange between the districts.

For this fiscal year, OC San has no industrial facilities discharging to LACSD. LACSD has four noncategorical permittees discharging to OC San, including Chemetall Oakite Corp., Coyle Reproductions, Inc., RockTenn CP, LLC, and T. Hasegawa USA Inc.

7.3 Irvine Ranch Water District (IRWD)

IRWD is a California Water District in central Orange County, California, which is served by several Revenue Zones within the jurisdiction of OC San and other agencies. The northern and coastal parts of IRWD are served by OC San. The pretreatment program in these sections is managed by OC San. A small portion of the eastern part of IRWD, called Portola Hills, is currently sewered to Santa Margarita Water District, a member of the South Orange County Wastewater Authority (SOCWA). SOCWA administers the pretreatment program for its member agencies.

On January 1, 2001, the Los Alisos Water District (LAWD) consolidated with IRWD. LAWD owned and operated a 5.5-million-gallon-per-day (MGD) water recycling plant (Los Alisos Water Reclamation Plant (LAWRP)) whose tertiary effluent is used under permits granted by both Region 8 and Region 9 Water Quality Control Boards. Secondary wastewater effluent up to 7.5 MGD that is not recycled is discharged to the Aliso Creek Ocean Outfall in Laguna Beach. IRWD also uses its capacity in the Aliso Creek Ocean Outfall to dispose of brine from the Irvine Desalter and treated groundwater from its Shallow Groundwater Unit facility. SOCWA administers the pretreatment program for discharges to the ocean outfall.

Most of IRWD is in OC San's service area, which collects sewage for treatment at either IRWD's Michelson Water Recycling Plant (MWRP) or OC San's Reclamation Plant No. 1. Currently, most of the sewage generated within Revenue Zone No. 14 is treated at MWRP, which is a tertiary treatment plant with a design capacity of 28 MGD. MWRP's highly treated effluent meets the State of California Title 22 regulations for the reuse of recycled water. During calendar year 2021, IRWD began to process all biosolids produced at

² County Sanitation District No. 3 of Orange County was a predecessor to OC San prior to consolidation of the various county sanitation districts into a single county sanitation district.

MWRP. 100% of MWRP biosolids was treated and recycled at the MWRP biosolids handling plant during the 2021-2022 fiscal year.

7.3.1 IRWD Operating Permit, Regional Board Order R8-2015-0024

On June 19, 2015, the Santa Ana Regional Water Quality Control Board adopted Order No. R8-2015-0024, superseding Order No. R8-2007-0003. Monitoring and Reporting Program under Order No. R8-2015-0024 requires an annual full priority pollutant scan, with quarterly samples analyzed for those pollutants that were detected in the annual scan. Sludge monitoring is not one of the requirements of the Order.

IRWD organic priority pollutant analyses for influent, effluent, and sludge are provided following the narrative. IRWD has scheduled priority pollutant monitoring more frequently than required by permit to provide additional information to OC San on the quality of wastewater and sludge in Revenue Zone 14. IRWD will continue to monitor the influent, effluent, and sludge quarterly.

On September 7, 2018, the Santa Ana Regional Water Quality Control Board adopted Order No. R8-2018-0070, amending Order No. R8-2015-0024, allowing for discharges to San Diego Creek under emergency conditions. IRWD is currently undergoing the process for permit renewal.

7.3.2 IRWD Analytical Reporting

Annually, the discharger shall submit... a summary of analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW's influent and effluent for those pollutants EPA has identified under Section 307(a) of the Act.

The collection points for the influent, effluent and sludge samples are as follows:

Influent:	Collected at headworks before grit basins.
Effluent:	Collected at the end of the chlorine contact basin (CCB), but downstream of where the CCB effluent and ultraviolet (UV) disinfected effluent are combined, just prior to entering the recycled water distribution system.
Sludge:	Collected at the flow meter vault on the MPS-3 force main prior to ferrous chloride injection.

The sampling of influent, effluent and sludge is performed by Regulatory Compliance personnel according to the following protocol:

1. Grab samples are collected quarterly for influent, effluent, and sludge samples and analyzed for volatile organic priority pollutants.
2. Composite samples are collected for BNA extractables, inorganic priority pollutants, pesticides/PCBs, and phenols at each location. This sampling is performed with a Sigma sampler that collects discrete samples at hourly intervals over a 24-hour period. The discrete samples are composited according to flow, and aliquots are distributed into the appropriate sample container. All the samples are collected in glass bottles and distributed into the appropriate glass or plastic bottle.

Samples are submitted to the IRWD Water Quality Laboratory where they are analyzed in house or contracted to either Weck Laboratories located in the City of Industry, or Eurofins Test America Laboratory located in the City of Irvine. Collected samples are preserved, refrigerated, and shipped on ice as required to the specific lab for analysis. Each lab supplies their respective sample containers with the preservatives as required by the method.

The detection limits may vary from quarter to quarter due to matrix interference and sensitivity of the analytical equipment, however, the results for each quarter are valid for the detection limit reported. IRWD and its contract laboratories have endeavored to meet or exceed reporting levels established in permits.

7.3.3 Inorganic Pollutants

General Minerals

Because IRWD is a water recycling agency, MWRP effluent is subject to general mineral requirements to protect Basin Plan water quality criteria. IRWD utilizes local groundwater and imported water to supply its customer domestic water needs, and the quality of the recycled water is based on the quality of the domestic supply. The current Basin Plan standards for the Irvine Groundwater Basin is 910 mg/L Total Dissolved Solids (TDS), and the current TDS limit for discharges to recycled water reservoirs designated as “Waters of the State” is 720 mg/L. As a purveyor of recycled water, the IRWD goal is to provide high quality water regardless of standards applied in the basin and has implemented several projects which improve the quality of the domestic water supply, which results in improvement in the quality of recycled water. In 1991, IRWD prepared the Michelson Influent Wastewater Quality Improvement Plan which identifies procedures to be followed to produce the highest quality recycled water. An important feature of the plan was to maximize the delivery of high-quality domestic water during the period of greatest recycled water consumption. In April 2002, IRWD commissioned its Deep Aquifer Treatment System plant, an 8-MGD membrane filtration plant, to provide additional high-quality domestic water for its customers. The treatment plant removes natural organic matter in the form of color from a low TDS (250 mg/L on average) deep groundwater source. In January 2007, IRWD commissioned the Irvine Desalter Project – Potable Treatment Plant (PTP), a 5.5-MGD reverse osmosis plant and in March 2013 commissioned the Wells 21/22 Desalter Plant, a 6.3-MGD reverse osmosis plant, to provide high quality domestic water for its customers. Both desalter plants remove minerals from water in the Irvine Groundwater Basin to provide a target of 420 mg/L TDS in the final product water. All three treatment plants are designed to operate continuously, thereby decreasing consumption of high TDS imported water, and improving mineral quality of the MWRP effluent. IRWD still needs to import some higher TDS water to meet its water supply needs.

The minerals rejected by the reverse osmosis system for the PTP are discharged into the ocean through the Aliso Creek Ocean Outfall, and for the Wells 21/22 Desalter Plant are discharged to the sewer that goes to OC San’s Reclamation Plant No. 1. For FY 2020/21, PTP operation has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 2,971 tons. For FY 2020/21, the Wells 21/22 Desalter has resulted in a net export of salt from the Irvine Groundwater Basin of approximately 1,340 tons.

Additionally, IRWD has completed a Salt Management Plan that identifies management strategies, cost estimates for implementing recommended actions, and provide recommendations for policies that may be considered to manage recycled water salt concentrations throughout the District. Those policies addressed both current and future conditions that take into consideration changing source water conditions during drought conditions as well as water conservation practices that can all impact the TDS concentrations of the sewage treated at MWRP.

The seasonal change in MWRP effluent mineral quality, on a fiscal year annual average, is also shown in Figure 7-1. The recycled water mineral quality, as expressed by total dissolved solids (TDS), varied by 102 mg/L during 2021/22. The effect of providing higher quality domestic water can be seen in the gradual reduction in TDS of the recycled water over the last six years. The slight increase that occurred during fiscal year (2015/2016) could have been due to impacts from ongoing water conservation efforts and increased TDS concentrations from imported water supplies.

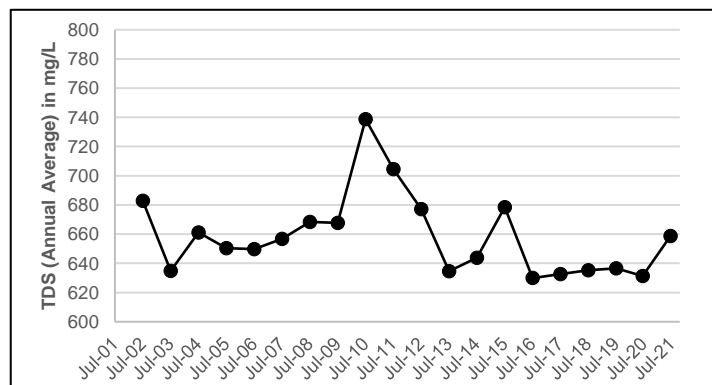


Figure 7-1 MWRP Effluent Total Dissolved Solids (Annual Average)
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Total Heavy Metals

IRWD has been analyzing the heavy metals on the list of inorganic priority pollutants for the last 39 years at MWRP. During the 39-year period, the total mass of heavy metals has increased from 5 pounds per day (lbs./day) to the current 37.51 lbs./day in the influent, an 8.9% decrease compared to the previous year, and has increased in the effluent from 10.09 to the current 12.73 pounds per day in 2021/22, a decrease of 16.5% from the previous fiscal year.

Of all the priority pollutant heavy metals, only two, copper and zinc were found in significantly greater concentrations than remaining metals. The sum of mass of copper and zinc represents 87% of heavy metals found in the influent and represents 90% of what is found in the effluent, with zinc being the overall heavy metal contributor at both locations. IRWD analyzes metals by ICP-MS which is capable of reporting metals in the sub part per billion range. Figure 7-2 shows the annual mass of total heavy metals in the influent and effluent of MWRP.

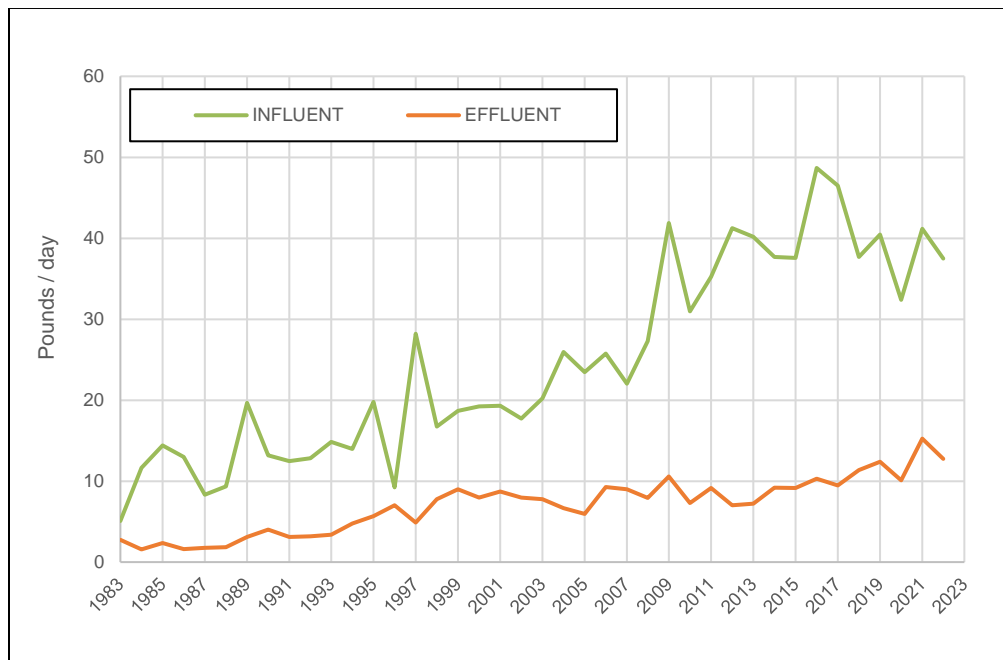


Figure 7-2 MWRP Influent and Effluent Total Heavy Metals
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Copper

The major sources of copper are domestic water systems and the printed circuit board industry. Both residential and nonresidential water plumbing are predominantly copper. Currently, IRWD does not have printed circuit board manufacturing in the MWRP service area. The major commercial source of copper is believed to be radiator repair; however, copper from radiator repair activities is declining since many of the newer radiators are made from aluminum and plastic. Growth in the area tributary to MWRP has begun to increase over the last few years and the increase in the amount of copper being discharged could potentially be from new copper plumbing.

Figure 7-3 shows that the mass of copper in the influent has increased over the 39-year period from 3.5 to 9.33 lbs./day, while the effluent decreased to 0.80 lbs./day during the 2021/22 fiscal year. The mass of copper entering the treatment plant in 2021/2022 increased by 9.1% from the 2020/2021 daily average. The mass of copper in the effluent dropped from 0.99 to 0.80 lbs./day. A decrease of 19% from the previous fiscal year.

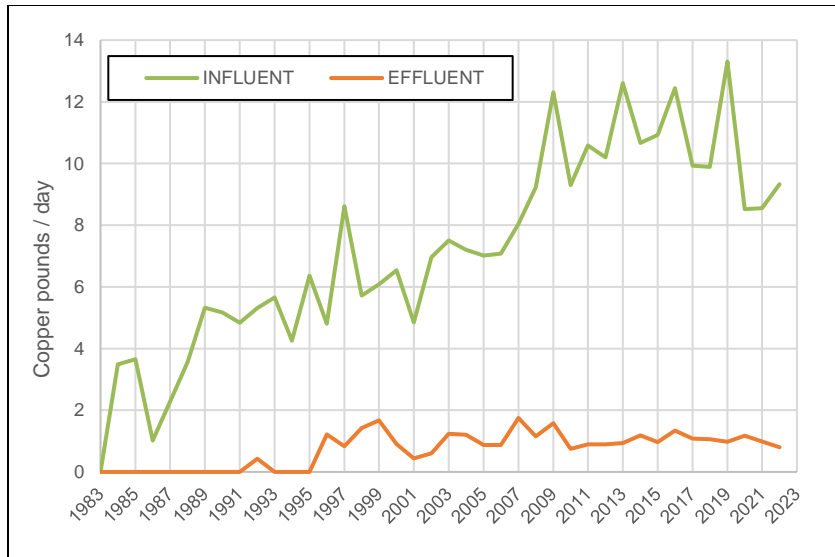


Figure 7-3 MWRP Influent and Effluent Copper
 Irvine Ranch Water District – Michelson Water Recycling Plant
 Orange County Sanitation District, Resource Protection Division

Zinc

Zinc is the predominant heavy metal detected in both the influent and effluent. The major sources of zinc are brass alloys used in domestic water systems, water and oil-based paints used by the building industry, and in chemicals and coatings used by industry. Figure 7-4 shows that the mass of zinc in the influent has increased from 4.6 lbs./day to 23.22 lbs./day over 39 years. The influent mass of zinc increased by 1.3 lbs./day or a 6.1% increase from the previous fiscal year. The mass of zinc in the effluent has also increased from 1 lbs./day to 10.73 lbs./day over the last 39 years and saw a decrease of 2.63 lbs./day, or -19.7%, from the previous fiscal year.

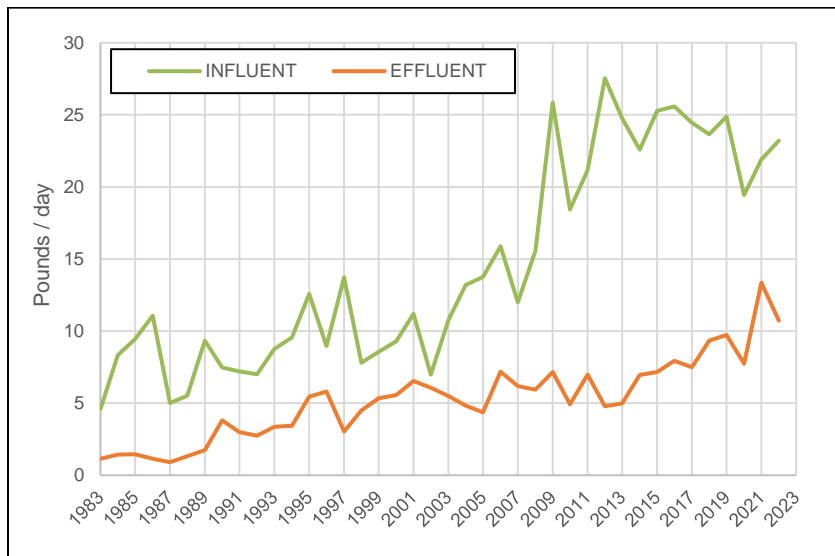


Figure 7-4 MWRP Influent and Effluent Zinc
 Irvine Ranch Water Department – Michelson Water Recycling Plant
 Orange County Sanitation District, Resource Protection Division

7.3.4 Organic Pollutants

IRWD has been analyzing for organic pollutants on the list of organic priority pollutants at MWRP since 1983. The sampling frequency has increased from once per year to quarterly sampling. Samples are collected from the influent, effluent, and sludge. Figure 7-5 shows the annual mass of total organic pollutants in the influent and effluent of MWRP. Over the last 39 years, the annual mass of total organic pollutants entering MWRP has widely varied and has decreased from a high of 16.82 lbs/day to the current 2.364 lbs/day. The mass of total organic priority pollutants leaving MWRP increased from 17.036 lbs/day in 2020/2021 to 22.230 lbs/day this fiscal year. The general increase in effluent organic pollutants above influent levels is attributed to an increase in trihalomethanes and other volatile organic compounds resulting from final effluent chlorination required to meet California Title 22 Water Recycling Criteria.

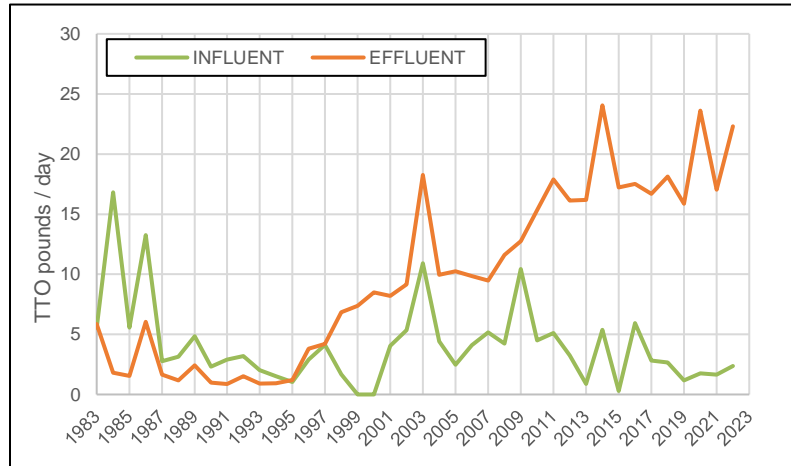


Figure 7-5 MWRP Influent and Effluent Total Toxic Organics
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

IRWD has completed its 10 MGD biological nitrogen removal membrane filtration plant expansion at the MWRP and the plant is now operating within its design capacity. The UV Disinfection system went online November 2015 and the effluent total toxic organics concentration and mass has been reduced as the concentration of trihalomethanes and other volatile organic compounds resulting from effluent chlorination has been reduced.

7.3.5 Report of Upset, Pass-Through and Interference Events

The discharger shall submit annually... a discussion of upset, interference, or pass-through incidents, if any, at the POTW which the discharger knows or suspects were caused by industrial users of the POTW system...

There were no upsets, interference or pass-through incidents caused by industrial users during the reporting period.

7.3.6 Discussion of the List of Industrial Users

The discharger shall submit annually... an updated list of the discharger's significant industrial users...

Table 7.1 summarizes those companies in Revenue Zones Nos. 7 and 14 which were under permit and in business as of June 30, 2022. Class I industrial users in Revenue Zone 7 discharge to the IRWD collection system and are treated at OC San's treatment plant. Class I industrial users in Revenue Zone 14 discharge to the IRWD collection system and are treated at MWRP and at OC San's treatment plant.

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District, Resource Protection Division – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-541182	Alliance Medical Products, Inc.	9342 Jeronimo Road (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District, Resource Protection Division – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-571332	Avid Bioservices, Inc.	14191 Myford Road (Tustin)	325414	Biological Product (except Diagnostic) Manufacturing	IRWD
1-071054	B. Braun Medical, Inc. (East/Main)	2525 MCGAW Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-600382	B. Braun Medical, Inc. (North/Alton)	2206 Alton Parkway (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-541183	B. Braun Medical, Inc. (West/Lake)	2525 MCGAW Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San
1-601616	Bioduro LLC (Fairbanks)	72 Fairbanks (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-601617	Bioduro LLC (Jeronimo)	9601 Jeronimo Road (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-600583	Brothers International Desserts (North)	1682 Kettering St. (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-600582	Brothers International Desserts (West)	1682 Kettering St. (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-600920	CP-Carrillo, Inc. (Armstrong)	17401 Armstrong Ave. (Irvine)	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	OC San
1-571316	CP-Carrillo, Inc. (McGaw)	1902 McGAW Ave. (Irvine)	336310	Motor Vehicle Gasoline Engine and Engine Parts Manufacturing	OC San
1-071162	Electrolurgy, Inc.	1121 Duryea Ave. (Irvine)	332813	Electroplating, Plating, Polishing, Anodizing, and Coloring	OC San
1-600585	FMH Aerospace Corp.	17072 Daimler St. (Irvine)	332912	Fluid Power Valve and Hose Fitting Manufacturing	OC San
1-571314	Graphic Packaging International, Inc.	1600 Barranca Parkway (Irvine)	322212	Folding Paperboard Box Manufacturing	OC San
1-541178	Imuraya USA, Inc.	2502 Barranca Parkway (Irvine)	311520	Ice Cream and Frozen Dessert Manufacturing	OC San
1-571327	Irvine Ranch Water District (Wells 21/22 Desalter)	1221 Edinger Avenue (Tustin)	221310	Water Supply and Irrigation Systems	OC San
1-601134	IsoTis OrthoBiologics, Inc.	2 Goodyear (Irvine)	339112	Surgical and Medical Instrument Manufacturing	IRWD
1-071056	Kraft Heinz Company	2450 White Road (Irvine)	311941	Mayonnaise, Dressing, and Other Prepared Sauce Manufacturing	OC San
1-601313	LGM Subsidiary Holdings LLC	17802 Gillette Ave. (Irvine)	325412	Pharmaceutical Preparation Manufacturing	OC San

Table 7.1 Class I Industries Within Irvine Ranch Water District Service Areas Orange County Sanitation District, Resource Protection Division – IRWD					
Permit No.	Facility Name	Physical Address	NAICS Code	Classification	Plant
1-071024	Maruchan, Inc. (Deere)	1902 Deere Ave. (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	OC San
1-601021	Maruchan, Inc. (Deere-South)	1902 Deere Ave. (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	OC San
1-141015	Maruchan, Inc. (Laguna Cyn)	15800 Laguna Canyon Road (Irvine)	311824	Dry Pasta, Dough, and Flour Mixes Manufacturing from Purchased Flour	IRWD
1-141023	Marukome USA, Inc.	17132 Pullman St. (Irvine)	311991	Perishable Prepared Food Manufacturing	OC San
1-601115	Meggitt (Orange County), Inc.	4 Marconi (Irvine)	334519	Other Measuring and Controlling Device Manufacturing	IRWD
1-071038	Newport Corporation	1791 Deere Ave. (Irvine)	334516	Analytical Laboratory Instrument Manufacturing	OC San
1-141012	Oakley, Inc.	1 Icon (Foothill Ranch)	339115	Ophthalmic Goods Manufacturing	IRWD
1-071235	Prudential Overall Supply	16901 Aston St. (Irvine)	812332	Industrial Launderers	OC San
1-571303	Rayne Dealership Corporation	17835 Sky Park Circle Suite M (Irvine)	454390	Other Direct Selling Establishments	OC San
1-600297	Shur-Lok Company	2541 White Road (Irvine)	332721	Precision Turned Product Manufacturing	OC San
1-600565	South Coast Baking, LLC	1711 Kettering St. (Irvine)	311821	Cookie and Cracker Manufacturing	OC San
1-141007	Teva Parenteral Medicines, Inc.	19 Hughes (Irvine)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-141163	Tropitone Furniture Co., Inc.	5 Marconi (Irvine)	337124	Metal Household Furniture Manufacturing	IRWD
1-600010	Vit-Best Nutrition, Inc.	2832 Dow Ave. (Tustin)	325412	Pharmaceutical Preparation Manufacturing	IRWD
1-601581	Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	16122 Construction CircleWest (Irvine)	562212	Solid Waste Landfill	OC San

7.3.7 Discussion of Industrial User Compliance Status

The discharger shall submit annually... a list or table characterizing the industrial compliance status of each SIU...

The compliance status of each noncompliant SIU is shown in OC San's Pretreatment Program Annual Report.

7.3.8 Summary of SIU Compliance

The District shall submit annually... a compliance summary table...

A summary of compliance is shown in OC San’s Pretreatment Program Annual Report.

7.3.9 Discussion of Significant Changes in the Pretreatment Program

The District shall submit annually... a short description of any significant changes in operating the pretreatment program which differ from the previous year...

There were no significant changes in operating the pretreatment program between the 2020/21 and 2021/22 fiscal years.

7.3.10 Pretreatment Program Costs

The District shall submit annually... a summary of the annual pretreatment budget and the pretreatment equipment purchases.

A financial summary of IRWD’s pretreatment program is shown in Table 7.2. All the expenses shown in Table 7.2 are related to the operation of IRWD’s pretreatment program by IRWD staff. All expenses incurred by IRWD under the Memorandum of Understanding between IRWD and OC San are summarized by OC San.

Table 7.2 Summary of Irvine Ranch Water District Pretreatment Program Costs, 2020 – 2021 and 2021 – 2022			
Orange County Sanitation District, Resource Protection Division – IRWD			
Project No.	Description	2020 – 2021 Labor	2021 – 2022 Labor
3093	Quarterly PP	\$192	\$1,181
3094	Baseline PP	\$203	\$0
3095	PP Surveillance	\$1,179	\$0
3096	Compat. Surveillance	\$1,279	\$0
3098	Industry Info. Collection	\$27,207	\$30,975
3099	Eval. Data/Reports	\$8,051	\$0
3100	OC San/SOCWA	\$3,286	\$0
Total		\$41,397	\$32,156

IRWD records expenses based on project numbers which represent specific activities or groups of related activities. During fiscal year 2021/22, IRWD spent \$32,156 on the operation of its pretreatment program, which is a decrease of \$9,241 from the previous year.

7.3.11 Equipment Purchases for FY 2021 – 2022

IRWD maintained its existing equipment inventory as shown in Table 7.3.

Table 7.3 Summary of Irvine Ranch Water District Pretreatment Equipment, Fiscal Year 2021-2022 Orange County Sanitation District Resource Protection Division – IRWD	
Quantity	Description
1	Ford F250
4	Sigma AS 950 portable compact auto samplers with pH
1	Sigma 900 Max insulated auto sampler with conductivity and pH
1	Sigma SD 900 insulated auto sampler
3	Sigma compact insulated auto sampler base (spare base) – 24 bottle configuration
3	Sigma large insulated auto sampler base – 24 bottle configuration
2	Sigma large insulated auto sampler base – 12 bottle configuration
6	Sigma lead-acid gel battery
3	Sigma battery charger, 5 stations
2	Sigma data transfer unit (DTU) and software
2	USB flash drive
1	Digital pH probe
1	Analog pH probe
2	Analog electrical conductivity probe
1	MSA gas detector

7.3.12 Discussion of Public Participation Activities

The District shall submit annually... a summary of public participation activities...

IRWD has a standing program of MWRP tours, where the public is instructed on the sewage collection and treatment, as well as proper hazardous waste disposal practices. These tours are temporarily suspended due to the COVID-19 pandemic, however, IRWD did conduct online (module) outreach programs including Water 101 (2 sessions) and a Biosolids Facility Tour. The Water 101 tour includes drinking and recycled waters as well as wastewater treatment. As an operator of a sewage collection system, IRWD is enrolled under the statewide general permit to manage fats, oils, and grease discharges from food service establishments. The public participation program is administered by IRWD staff with contractor support.

7.3.13 Discussion of Biosolids Treatment and Recycling Activities

The District shall submit annually... a description of any changes in sludge disposal methods...

IRWD began construction in October 2013 of its Biosolids and Resource Recovery Project, that consists of solids thickening, acid-phase anaerobic digestion, dewatering, drying/pelletizing, energy generation using microturbines, and use of pellets as a fertilizer or e-fuel. The project is currently in the commissioning phase, and once completed IRWD will only send solids to OC San for treatment as required. In fiscal year 2021/2022 IRWD was treating all of its wastewater solids onsite in the Biosolids Facility producing Class B and Class A (pellets) biosolids.

7.3.14 IRWD Additional Information

The District shall submit annually... any concerns not described elsewhere in the report.

Michelson Water Recycling Plant Flow

Figure 7-6 shows the wastewater flow received by MWRP over the last 39 years. MWRP flow has generally increased over the years with a few exceptions. Average flow for the 2021/22 fiscal year was 21.79 MGD which was a 2% increase from the previous fiscal year. The increase in influent flow may be attributed to the lifting of pandemic restrictions; however, the prior year also saw an increase.

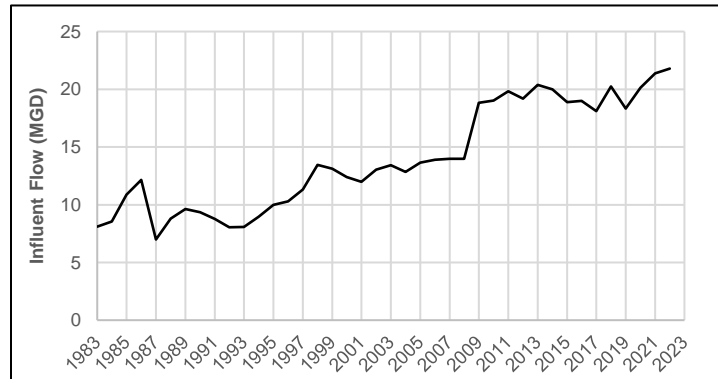


Figure 7-6 MWRP Influent Flow

Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

Nitrification/Denitrification Facilities

IRWD completed a significant upgrade to MWRP by installing a nitrification/denitrification system on its activated sludge system in the 1998-99 fiscal year. Plant effluent is now fully nitrified year-round and substantially denitrified during the months when recycled water is stored in IRWD open storage reservoirs. A fully nitrified effluent means that IRWD maintains a free chlorine residual rather than a combined chlorine residual. A free chlorine residual causes a greater formation of trihalomethanes and related volatile organic compounds, which is evident by the presence of total toxic organic compounds in the effluent. Fortunately, the quality of plant effluent, detention time in the plant, and short time before storage or use, keeps the level of toxic organic compounds below regulatory criteria, even though a relatively high chlorine dose is required to maintain bacterial quality. The operation of the nitrification/denitrification system has improved activated sludge operations, which in turn, has increased the quality of recycled water.

Industrial Parks Development Status

Since the early 1980s, MWRP has been receiving increased industrial wastewater flows from the Irvine Spectrum. The industrial parks located with IRWD's service area are primarily the Irvine Spectrum, a large industrial park located near the former El Toro Marine Corps Air Station and the Foothill Ranch industrial area, located north and east of the El Toro Marine Corps Air Station. The El Toro Marine Corps Air Station is decommissioned and will be the site of the Great Park Development, a master planned community. IRWD sees the potential for gradually increasing levels of organic pollutants and heavy metals as the Irvine Spectrum industrial park and Foothill Ranch sites continue to expand and develop. The University of California, Irvine is expanding the University Research Park located on the southern portion of the university. IRWD sees a potential for organic priority pollutant and heavy metal discharges from the industrial/research parks.

Stormwater, Deminimis Discharges and Selenium

In May 2009, the Santa Ana Regional Water Quality Control Board adopted the fourth term *Waste Discharge Requirements for the County of Orange, Orange County Flood Control District, and Incorporated Cities of Orange County Within the Santa Ana Region Areawide Stormwater Runoff Orange County*, Order R8-2009-0030. A condition of this permit is a requirement that non-stormwater discharges be prohibited from discharge into the storm drain except for urban runoff and certain authorized non-stormwater discharges. As a result, there has been an increase of non-wastewater discharges into the sewer system. In general, these discharges contribute to the hydraulic loading to the sewer system and have not been a significant source of conventional and other pollutants.

The northeastern side of the Irvine Basin is dominated by coastal foothills, and historically runoff from the foothills deposited in a seasonal marsh called the Cienega de las Ranas. Natural weathering of the coastal foothills has exposed and eroded the Monterey Formation containing significant amounts of selenium, which over time have accumulated in the seasonal marsh. In addition to runoff, rising groundwater in the area of the seasonal marsh has raised the concentration of selenium in surface water well above the California Toxics Rule criterion of 5 µg/L. The seasonal marsh has been drained, first to promote agriculture, and then the agricultural land has been converted into urban development. Surface waters in the watershed are listed on the Section 303(d) list for selenium impairment, and discharges of water into the surface water system above 5 µg/L are regulated under the Basin Plan.

The effect of the additional prohibition of non-stormwater discharging into the storm drain system has resulted in additional non-stormwater flows being discharged into the sewer system containing significant levels of selenium from groundwater dewatering operations. Some of the discharges are tributary to OC San's sewer system, and the selenium is ultimately returned to the ocean. However, some of the discharges are tributary to the IRWD sewer system. IRWD

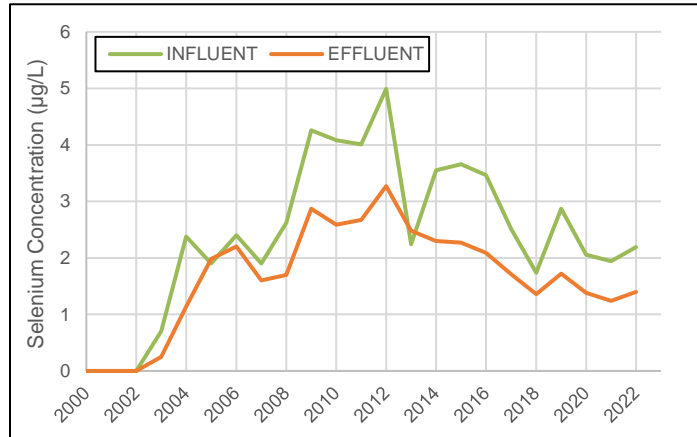


Figure 7-7 MWRP Influent and Effluent Selenium
Irvine Ranch Water District – Michelson Water Recycling Plant
Orange County Sanitation District, Resource Protection Division

has been tracking the fate and transport of selenium since 2002 to garner knowledge on the effect of the additional non-stormwater discharges on MWRP effluent quality. During this last fiscal year, the average effluent selenium concentration was approximately 1.4 µg/L, below the California Toxics Rule criterion. Prior to 2002, the concentration of selenium in the wastewater was negligible, because there was no selenium in the domestic water supply, there were no industries discharging selenium and non-wastewater discharges into the sewer system were prohibited. Because selenium toxicity is based on concentration, IRWD will continue to monitor the concentration of selenium in the influent and effluent from the MWRP.

IRWD Oversight Activities

IRWD has monitored four major trunklines within its service area for priority pollutants. Commercial, residential and industrial areas were monitored on an annual basis. One purpose of this monitoring is to establish a long-term history of priority pollutant discharges into the sewer system. Phthalates are used to maintain flexibility in plastic products and are commonly found. The low concentrations of these constituents are common and are considered emerging pollutants of concern.

Additionally, within the IRWD service area, industrial activities are regulated by the City of Irvine General Plan and Zoning Ordinances, which confines industrial uses to specific zones and the City of Lake Forest, which is the agency currently responsible for the Foothill Ranch Master Plan. Currently, IRWD is reassessing its monitoring programs and locations.

The IRWD service area encompasses the San Diego Creek watershed, the largest watershed that is tributary to Newport Bay. Newport Bay and its tributary watersheds are subject to Total Maximum Daily Load (TMDL) allocations for sediment, nutrients, pathogens, and toxics. IRWD does not discharge wastewater into surface waters, other than its open storage reservoirs; however, as the sole purveyor of water and recycled water in the watershed, IRWD has chosen to become involved with water quality management in the watershed. IRWD is constructing and managing wetlands, under the Natural Treatment Systems Project, which will remove pollutants of concern to the TMDL allocations. IRWD extends its services to assist commercial and industrial users to recognize the importance of site runoff water quality, point out sources of contamination and areas of potential contamination, and advice on corrective measures.

Local Limits Study

Due to the completion of IRWD's Phase II Expansion at MWRP, as well as the construction of a solids and biosolids handling facility, IRWD decided to undertake a technical evaluation of its local limits that began in 2016, and was completed and submitted to the Regional Board for their approval in October 2016. The local limits study evaluated if IRWD's current limits are protective of not only the new unit processes within IRWD but were also protective enough to ensure that IRWD can produce Class A EQ biosolids, as well as potentially evaluate additional pollutants of concern. IRWD received approval of its local limits by the Regional Board in 2018 and has had them adopted by its Board in May 2018. IRWD staff expect to conduct the next Local Limits Study during the next permit cycle, which is currently pending renewal.

7.4 Santa Ana Watershed Project Authority (SAWPA)

OC San has a National Pollutant Discharge Elimination System (NPDES) permit for ocean discharge and is the Control Authority for the Pretreatment Program required by federal regulations. Because SAWPA discharges to OC San through the SARI Line, SAWPA is subject to OC San's Pretreatment Program. Through a 1991 Memorandum of Understanding (1991 MOU), OC San enabled SAWPA to be OC San's Delegated Control Authority for the Pretreatment Program in SAWPA's SARI Service Area. SAWPA's responsibilities to run a Pretreatment Program on behalf of OC San, ability to discharge to the SARI Line, and other financial factors are governed by agreements between OC San and SAWPA, including the 1991 MOU and a 1996 Wastewater Treatment and Disposal Agreement (1996 Agreement), as amended and succeeded. OC San routinely reviews all SAWPA Commission, Commission Workshop, and Project Agreement meeting agendas and minutes to stay current with the activities in the SAWPA area that may have an impact on the SAWPA Pretreatment Program. In addition, OC San routinely meets with SAWPA to coordinate at administrative, technical, management, and leadership levels with varying levels of staff in attendance at each meeting to improve the coordination between OC San's and SAWPA's Pretreatment Programs and to enhance the working relationship with SAWPA in all areas of the 1991 MOU and 1996 Agreement.

SAWPA was formed in 1968 to develop a long-range plan for managing, preserving, and protecting the quality of water supplies in the Santa Ana Basin. SAWPA is a Joint Powers Authority (JPA) consisting of five agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley District), and Western Municipal Water District (Western). SAWPA's program in water quality management is integrated with those of other local, state, and federal agencies.

The Inland Empire Brine Line (Brine Line) is a pipeline that is designed to carry saline wastewater from the Upper Basin to the Orange County Sanitation District (OC San) for disposal, after treatment, into the Pacific Ocean. This wastewater today consists primarily of desalter brine and saline wastewater from industrial uses, but also has some temporary domestic discharges. Wastewater from the Brine Line is transferred to the SARI Line in Orange County which transports the wastewater to Orange County Sanitation District (OC San) Plant No. 2. A flow meter installed at the Orange County line measures SAWPA's discharge. The capacity of the Brine Line available to SAWPA is 30 MG per day (MGD). For the 12-month period from July 1, 2021 through June 30, 2022, a total of 3,984 MG was discharged into the Brine Line, for an average of 10.92 MGD.

7.4.1 Brine Line System Pretreatment Program Overview

SAWPA has a wastewater discharge ordinance applicable to the Brine Line. It is essentially, with some appropriate modifications, substantially similar to OC San's Wastewater Discharge Regulations Ordinance. In addition, a Memorandum of Understanding is in place to delineate pretreatment permitting, monitoring, enforcement, and reporting responsibilities between SAWPA and OC San. SAWPA has entered into a Multijurisdictional Pretreatment Agreement (Agreement) with the Member Agencies, EMWD, IEUA, Valley District, and Western and Contract Agencies, City of Beaumont (Beaumont) Jurupa Community Services District (JCSD), San Bernardino Municipal Water Department (SBMWD), and Yucaipa Valley Water District (YVWD). This Agreement delineates the pretreatment responsibilities between SAWPA and the agencies to carry out and enforce a pretreatment program to control discharges from Industrial Users (IU) located in their service areas.

SAWPA owns and operates the Brine Line above or upstream of the Orange County line and has purchased 17 MGD of treatment and disposal capacity rights at OC San's treatment facilities. SAWPA, through the MOU with OC San, has the ultimate responsibility to ensure adequate implementation of Pretreatment Program responsibilities in the Upper Basin portion of the Brine Line. SAWPA issues permits to Direct and Indirect Dischargers jointly with Member and Contract Agencies and solely issues permits to all Member and Contract Agency owned or affiliated Direct and Indirect Dischargers. In addition, SAWPA has the Permitting responsibilities for all Liquid Waste Haulers (LWH) that use the four SAWPA-approved Collection Stations. The SAWPA LWH permits assign, for each discharger, a primary collection station and alternate collection stations should the primary collection station become unavailable due to repairs or closure.

Agency staff assists in the conduct of the program for non-agency permittees within their service area. SAWPA conducts all pretreatment oversight activities for agency owned or affiliated permittees. SAWPA has identified, categorized, and summarized the permits herein by geographical location and support from the Member and Contract Agencies. Roles and responsibilities are defined in SAWPA's policies and procedures. SAWPA has two dedicated full-time pretreatment personnel and an additional 1.2 full-time equivalent (FTE) to assist with pretreatment responsibilities. Combined, the 3.2 FTE, along with additional personnel from both Member and Contract Agencies, prepared and issued permits, conducted inspections, prepared enforcement actions, and prepared monthly, quarterly, and annual reports by the date required.

During the reporting period SAWPA continued implementation of numerous program documents and worked to improve the operation and implementation of the Pretreatment Program. SAWPA and the Member and Contract Agencies use Pretreatment Program Control Documents (PPCDs) for uniform and consistent implementation of the Pretreatment Program. A Data Management System (iPACS) continued to be used.

Reporting below is individually presented for each SAWPA Pretreatment Program Member and Contract Agency.

7.4.2 SAWPA, Member Agency, and Contract Agency Pretreatment Programs

7.4.2.1 The City of Beaumont (Beaumont)

Description of Beaumont

Beaumont is the owner and operator of the City of Beaumont wastewater treatment plant and will be responsible for the implementation of certain pretreatment program activities for the industries connected to the Brine Line within its service area upon its connection to the Brine Line in 2020. Beaumont has been required by the Santa Ana Regional Water Quality Control Board to proactively manage salinity in the two underlying groundwater basins, the Beaumont and San Timoteo Groundwater Management Zones. As a result, Beaumont has installed a Reverse Osmosis (RO) treatment of the tertiary treated wastewater treatment plant effluent. The RO concentrate is discharged to the Brine Line. The Beaumont wastewater treatment plant discharges to Cooper's Creek, tributary to San Timoteo Creek, which is tributary to the Santa Ana River. By discharging the brine concentrate to the Brine Line, discharge of a minimum 685 tons of salt to the Santa Ana River are avoided, benefiting the downstream groundwater basins. Currently there are no permitted users within the Beaumont Service Area.

Although Beaumont currently has no permitted industries discharging to the Brine Line they have participated in Brine Line activities, including training conducted by SAWPA personnel, since early-2020. They conduct the industrial user survey upstream of the City of Beaumont wastewater treatment plant that began discharge to the Brine Line in July of 2020, in accordance with SAWPA policies and procedures.

Enforcement Actions

There was no enforcement action during this reporting period.

7.4.2.2 Eastern Municipal Water District (EMWD)

Description of EMWD

EMWD is a Municipal Water District responsible for the implementation of certain pretreatment activities for the indirect and direct industries that discharge to EMWD's Non-Reclaimable Waste Line, which discharges to the Brine Line at Reach V. In the face of declining groundwater levels and continuing droughts, EMWD was formed in 1950 to secure additional water for a lightly populated area of western Riverside County. EMWD joined the Metropolitan Water District of Southern California a year later to augment its local supplies with recently available imported water. EMWD also provides sewer service throughout its area. The EMWD headquarters are located in Perris, California and serves the eastern portion of the watershed in Riverside County, as well as portions of the Santa Margarita Watershed, south of the Santa Ana River Watershed.

Enforcement Action

There was no enforcement action during this reporting period.

7.4.2.3 Inland Empire Utilities Agency (IEUA)

Description of IEUA

IEUA is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries located within IEUA's service area. IEUA, originally named the Chino Basin Municipal Water District (CBMWD), was formed in 1950 to supply supplemental water to the region. Since its formation, IEUA has expanded its areas of responsibility from a supplemental water supplier to a regional wastewater treatment agency with domestic and industrial disposal systems and energy recovery/production facilities. In addition, IEUA has become a recycled water purveyor, bio-solids/fertilizer treatment provider and continues as a leader in water supply salt management, for the purpose of protecting the region's vital groundwater supplies.

IEUA strives to enhance the quality of life in the Inland Empire by providing optimum water resources management for the area's customers while promoting conservation and environmental protection. IEUA covers 242-square miles, distributes imported water, provides industrial/municipal wastewater collection and treatment services, and other related utility services to more than 875,000 people. IEUA's service area includes the Cities of Chino, Chino Hills, Fontana, Montclair, Ontario and Upland, as well as the Cucamonga Valley Water District.

Enforcement Actions

Eastside Water Treatment Facility (Permit No. D1024-3)

On December 22, 2021, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Eastside Water Treatment Facility (EWTF) due to a prohibited discharge. On November 29, 2021, the permittee attempted to discharge a load of wastewater at the IEUA collection station. The station locked the permittee out and the discharge was ceased due to detection of low pH. An IEUA inspector responded and determined the wastewater load contained oil and grease which fouled the pH probe and caused the pH probe/meter to malfunction. The inspector determined that the tanker truck contained a mixed load of brine and oily wastewater, a violation of Wastewater Permit No. I1024-3. The NOV/OCA required the permittee to submit a written report detailing the cause of these violations and corrective actions taken to prevent recurrence on or before December 30, 2021. The permittee responded on December 28, 2021, stating it checked its processes and wastewater holding tanks and no "oil substances" were detected. Additionally, the permittee also checked the pH of the load prior to loading the tanker and it was found to be in compliance. The permittee concluded that the source of the "oily substance" originated from the tanker itself. The permittee updated its disposal of wastewater SOP which now states it will check each tanker prior to loading its wastewater to ensure it is clean. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at EWTF to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

Niagara Bottling, LLC (Permit No. D1114-2)

On October 28, 2021, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Niagara Bottling, LLC (Niagara) for a pollutant discharge limitation. On October 25, 2021, IEUA detected

a low pH at the IEUA collection station while the wastewater load from the permittee was attempting to discharge. The pH was measured at 5.86 SU which exceeds the lower pH limit of 6.0 SU, a violation of Wastewater Discharge Permit No. I1114-2. The NOV/OCA requires the permittee to resample for pH and submit the result on or before November 11, 2021. Furthermore, the permittee is required to submit a written report detailing the cause and corrective actions taken to prevent pH violation recurrence on or before November 4, 2021. On November 4, 2021, the permittee responded, stating it will check valves for calcium carbonate accumulation to ensure CIP chemicals are not blending with brine wastewater as this had been found to be the cause of low pH wastewater in the past. Additionally, the permittee stated its contractor will move the pH alarm to another high traffic HMI panel located inside the production building. The HMI panel that controls the pH shutoff valve has a reset button that can override the shut off valve. As a precaution, Niagara will have its contractor reprogram the reset button to be password protected to prevent resets without supervisor approval. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. IEUA shall continue to conduct unannounced inspections and wastewater monitoring at Niagara to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.4 Jurupa Community Services District (JCSD)

Description of JCSD

JCSD is a public agency responsible for the implementation of certain pretreatment program activities for the direct industries connected to the Brine Line via JCSD's sewer collection system within its service area (Brine Line Reach IV-D). JCSD headquarters is located at 11201 Harrel Street in the City of Jurupa Valley. JCSD was formed in 1956 and provides water, sewer, park services, graffiti abatement, and street lighting. In 1988 the District formed the Community Facilities District (CFD) No. 1 to provide for water, sewer, flood control and street infrastructure within the industrial portion of the Mira Loma area. The boundaries of CFD No. 1 expanded from 1,900 acres to 3,000 acres in 1992. In June 1989, JCSD contracted with Western for capacity in Reach IV-D of the Brine Line.

Enforcement Action

There was no enforcement action during this reporting period.

7.4.2.5 San Bernardino Municipal Water Department (SBMWD)

Description of SBMWD

SBMWD is a Municipal Water Department and is responsible for administering certain pretreatment program activities for indirect industries associated with the SBMWD Brine Line Collection Station. SBMWD provides potable water and sewerage services for the City of San Bernardino, in addition to sewerage service for the cities of Loma Linda and Highland, as well as some isolated county areas. These services are augmented by the operation of a brine waste collection station which provides an alternate disposal site for industries which generate high strength brine waste. The SBMWD, under contract with the San Bernardino Valley Municipal Water District, is responsible for administering the pretreatment program associated with the SBMWD Brine Line Collection Station.

Enforcement Action

Rayne Water Conditioning (Permit No. I1066-3)

On February 17, 2022, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rayne Water Conditioning (Rayne) for failure to submit required self-monitoring reports. The permittee was required to conduct semi-annual monitoring and submit the self-monitoring reports no later than February 7, 2022, a violation of Wastewater Permit No. I1066-3. The NOV/OCA required the permittee to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation by no later than February 27, 2022. The permittee was also required to complete semi-annual monitoring and submit the past due monitoring reports no later than March 17, 2022. The permittee responded on February 21, 2022 and stated the cause of the violation was a clerical error when previously updating electronic reminders, which resulted in the semi-annual reminders being deleted. The permittee stated the

corrective action was to separate monitoring event reminders from other electronic reminders. On February 23, 2022, the Permittee submitted the required semi-annual monitoring reports which indicated compliance with the discharge limitations as stated in Permit No. I1066-3. Implementation of the corrective actions identified above, and follow-up sampling indicated compliance; subsequently, the enforcement action was closed. SBMWD shall continue to conduct unannounced inspections and wastewater monitoring at Rayne to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.6 San Bernardino Valley Municipal Water District (Valley District)

Description of Valley District

Valley District is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct industries connected to the Brine Line within its service area (Brine Line Reach IV-E). Valley District headquarters is located in the City of San Bernardino and serves most of the northern and eastern reaches of the watershed in San Bernardino County with a small portion of its service area in Riverside County. Valley District was formed in 1954 to plan long-range water supply for the San Bernardino Valley. It is the only State Water Contractor within SAWPA and imports water into its service area through participation in the California State Water Project while also managing groundwater storage within its boundaries. It was incorporated under the Municipal Water District Act of 1911 (California Water Code Section 7100 et seq., as amended). Its enabling act includes a broad range of powers to provide water, as well as wastewater, stormwater disposal, recreation, and fire protection services.

Enforcement Action

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On November 19, 2021, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Rialto Bioenergy Facility, LLC (RBF) for pollutant discharge violations. From July 22, 2021, through October 29, 2021, the permittee reported eleven (11) BOD and one (1) TSS self-monitoring results which exceeded 25 mg/L, a violation of the interim discharge limitations as stated in Wastewater Discharge Permit No. D1130-1. The NOV/OCA required the permittee to provide a corrective action plan by November 29, 2021, that identifies all steps taken or planned to correct the chlorine shortages that RBF personnel identified for the cause of the repeated BOD violations identified. The permittee responded on November 29, 2021, identifying that it had switched chlorine providers to ensure adequate supply onsite. Additional violations were reported on subsequent self-monitoring reports and additional enforcement was issued for these violations.

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On January 17, 2022, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to RBF for pollutant discharge violations. From December 1, 2021, through December 16, 2021, the permittee reported two (2) BOD and two (2) TSS self-monitoring results which exceeded 25 mg/L, a violation of the interim discharge limitations as stated in Wastewater Discharge Permit No. D1130-1. The NOV/OCA required the permittee to provide a response by January 21, 2022, that identifies the cause of the violations and the corrective actions taken by the permittee. Prior to submittal of the January 21, 2022, NOV/OCA response additional violations were reported on subsequent self-monitoring reports and additional enforcement was issued for these violations.

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On February 2, 2022, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to RBF for pollutant discharge violations. From December 17, 2021, through January 4, 2022, the permittee reported three (2) BOD and two (2) TSS self-monitoring results which exceeded 25 mg/L, a violation of the interim discharge limitations as stated in Wastewater Discharge Permit No. D1130-1. The NOV/OCA required the permittee to provide a response by February 10, 2022, that identifies the cause of the violations and the corrective actions taken by the permittee. Prior to submittal of the February 10, 2022, NOV/OCA response additional violations were reported on subsequent self-monitoring reports and additional enforcement was issued for these violations.

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On April 11, 2022, a Notice of Violation (NOV) a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to RBF for pollutant discharge violations. From March 3, 2022, through March 21, 2022, the permittee reported ten (10) BOD and four (4) TSS self-monitoring results which exceeded 25 mg/L, a violation of the interim discharge limitations as stated in Wastewater Discharge Permit No. D1130-1. The NOV/OCA required submission of a written corrective action plan detailing the cause(s) for multiple daily exceedances to the BOD and TSS limitations listed in Permit No. D1130-1. The Permittee responded on April 18, 2022 and identified the following corrective actions: hiring a consultant to inspect the membrane bioreactors and make recommendations for improvements in maintenance and operational procedures; and to change out membranes of Train # 2 and order replacements for Train #1. Additional violations were reported on subsequent self-monitoring reports and additional enforcement was issued for these violations.

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On April 29, 2022, a Notice of Violation (NOV) a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to RBF for pollutant discharge violations. From March 22, 2022, through March 28, 2022, the permittee reported seven (7) BOD and three (3) TSS self-monitoring results which exceeded 25 mg/L, a violation of the interim discharge limitations as stated in Wastewater Discharge Permit No. D1130-1. An NOV/OCA was previously issued on April 11, 2022, for the same constituents which required the permittee to issue a written corrective action plan. Said plan was received on April 18, 2022 and serves as the response for the violations yet to be determined for the remainder of March 2022 so a second corrective action plan was not required. Additional violations were reported on subsequent self-monitoring reports and additional enforcement was issued for these violations.

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On May 18, 2022, a Notice of Violation (NOV) a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to RBF for pollutant discharge violations. From March 22, 2022, through March 28, 2022, the permittee reported eleven (11) BOD self-monitoring results which exceeded 25 mg/L, a violation of the interim discharge limitations as stated in Wastewater Discharge Permit No. D1130-1. The NOV/OCA required the permittee to submit a corrective action plan for the noted daily violations was required to include, at a minimum, the suspected cause(s) and all corrective actions taken or planned to prevent further occurrence by no later than May 28, 2022. Prior to submittal of the May 28, 2022, NOV/OCA response additional violations were reported on subsequent self-monitoring reports and additional enforcement was issued for these violations.

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On June 10, 2022, a Notice of Violation (NOV) a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to RBF for pollutant discharge violations. From March 22, 2022, through March 28, 2022, the permittee reported twelve (12) BOD self-monitoring results which exceeded 25 mg/L, a violation of the interim discharge limitations as stated in Wastewater Discharge Permit No. D1130-1. The NOV/OCA required the permittee to respond in writing with a summary of the probable cause(s) for said violation(s) and the corrective action(s) taken or being taken no later than June 24, 2022. Prior to submittal of the May 28, 2022, NOV/OCA response additional violations were reported on subsequent self-monitoring reports and additional enforcement was issued for these violations. It is anticipated that Valley District will issue further enforcement for these violations in July 2022. Valley District shall continue to conduct unannounced inspections and wastewater monitoring at Rialto Bioenergy Facility, LLC to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.7 Santa Ana Watershed Project Authority (SAWPA)

Description of SAWPA

SAWPA is a Joint Powers Authority, classified as a Special District under State of California law, responsible for the implementation of the pretreatment program for the industries connected to the Brine Line. SAWPA consists of five Member Agencies: Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Orange County Water District (OCWD), San Bernardino Valley Municipal Water District (Valley

District), and Western Municipal Water District (Western). SAWPA, through the MOU with OC San, has the ultimate responsibility to ensure adequate implementation of Pretreatment Program responsibilities in the Upper Basin portion of the Brine Line. SAWPA issues permits to Direct and Indirect Dischargers jointly with Member and Contract Agencies and solely issues permits to all Member and Contract Agency owned or affiliated Direct and Indirect Dischargers.

Enforcement Actions

Rialto Bioenergy Facility, LLC (Permit No. D1130-1)

On May 13, 2021, an Administrative Compliance Order (Order) was issued to Rialto Bioenergy Facility, LLC (RBF) by SAWPA for continued pollutant discharge violations. Additionally, an Interim Discharge Period Extension was issued, which allowed continued discharge to the existing connection to the Brine Line to no longer than November 9, 2021. On March 7, 2021, the permittee's contract laboratory collected a wastewater sample from Monitoring Point 001. The laboratory analyses results indicated a Biochemical Oxygen Demand (BOD) concentration of 28 mg/L, which exceeded the Daily Maximum Discharge Limitation of 25 mg/L as stated in Permit No D1130-1. On March 20 and May 5, 2021, the permittee's contract laboratory collected a wastewater sample from Monitoring Point 001. The laboratory analyses results indicated Total Suspended Solids (TSS) concentrations of 49 mg/L and 110 mg/L, which exceeded the Daily Maximum Discharge Limitation of 25 mg/L as stated in Permit No D1130-1. The Order requires the permittee to complete construction of a new lateral connection to the Brine Line by November 9, 2021. Furthermore, the permittee is required to provide weekly updates on the process of obtaining the necessary permits for construction of the new lateral connection and within 5 business days of receipt of these permits submit a written report to SAWPA. The Permittee will then submit a monthly progress report on the construction of the new lateral connection and submit written notice of its completion within 5 days of completion of all construction activities. The Permittee submitted revised plans of the connection to SAWPA for review and approval. During SAWPA's review of these documents the deadline for completion of construction was extended to accommodate this review. On June 22, 2022, RBF signed the New Lateral Construction and Cost Share Agreement (Agreement) with SAWPA and Valley with an effective date of June 23, 2022. As outlined in the Agreement SAWPA will construct the new lateral to allow the Permittee's temporary discharge, as described in the Interim Discharge Plan, to be removed from the Siphon and connected to the Brine Line at a new location downstream of the Siphon. It is anticipated that due to this Agreement the Order will be closed in July of 2022. SAWPA and Valley District shall continue to conduct unannounced inspections and wastewater monitoring at Rialto Bioenergy Facility, LLC to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.7.1 SAWPA Waste Hauler Program

SAWPA solely permits the Waste Haulers allowing for the Waste Haulers to have only one permit to provide service to the four Member Agencies' Collection Stations. This also facilitates utilization of the Generator's regular Waste Hauler if an Alternate Collection Station must be used.

Existing Permits – Permitted Waste Haulers

- **Alpha Petroleum Transport, Inc. II (Permit No. H1126-2.3)**
22740 Temescal Canyon Road, Corona, CA 92883
- **Environmental Management Technologies, Inc. (Permit No. H1025-4.1)**
1456 S. Gage Street, San Bernardino, CA 92408
- **Haz Mat Trans, Inc. (Permit No. H1033-4.1)**
230 E. Dumas Street, San Bernardino, CA 92408
- **K-VAC Environmental Services, Inc. (Permit No. H1049-4.1)**
8910 Rochester Avenue, Rancho Cucamonga, CA 91730
- **Rayne Water Conditioning (Permit No. H1066-4)**
939 West Reece Street, San Bernardino, CA 92411

- **Triumvirate Environmental Services, Inc. (Permit No. H1132-1)**
10600 S Painter Ave, Santa Fe Springs, CA, 90670
- **Western Environmental Services, Inc. (Permit No. H1098-4)**
400 W. Foothill Blvd., Suite H, Glendora, CA 91740

Enforcement Action

Alpha Petroleum Transport, Inc. II (Permit No. H1126-2.3)

On January 31, 2022, a Notice of Violation and Order for Corrective Action (NOV/OCA) was issued to Alpha Petroleum Transport for failure to follow the facility's Liquid Waste Hauler Cleaning and Maintenance Plan (LWHCMP). The NOV/OCA required the permittee to submit a written report to SAWPA detailing how the violations shall be prevented in the future by February 15, 2022. The Permittee responded on February 15, 2022 and attributed the cause of the violation to improper cleaning of equipment and provided an updated LWHCMP to ensure violations of this type do not occur again in the future. The plan was accepted as submitted and the enforcement was closed on February 24, 2022. SAWPA shall continue to conduct unannounced inspections and wastewater monitoring at the Collection Stations to ensure consistent compliance with permit requirements and SAWPA Ordinance No. 8.

7.4.2.8 Western Municipal Water District (Western)

Description of Western

Western is a Municipal Water District responsible for the implementation of certain pretreatment program activities for the direct and indirect industries connected to the Brine Line within its service area (Reach IVD, Reach IVB and Reach V). Western was formed in 1954 under the Municipal Water District Act of 1911 for the purpose of bringing supplemental water from the Metropolitan Water District of Southern California to a growing western Riverside County. Western's service area covers 527 square miles, serving a population of approximately 900,000 people. The District serves 10 wholesale customers with imported water via the Colorado River and the State Water Project. Western also supplies imported water and groundwater directly to approximately 25,000 residential, commercial and agricultural customers in the areas of El Sobrante, Eagle Valley, Temescal Creek, Woodcrest, Orangecrest, Mission Grove, Lake Mathews, March Air Reserve Base, Rainbow Canyon and portions of the cities of Riverside and Murrieta. The Murrieta division provides water and wastewater services in a 6.5-square mile portion of Murrieta and relies on both groundwater and imported sources. Western headquarters is located in Riverside, California and serves the western Riverside County portion of the watershed, as well as portions of the Santa Margarita Watershed, south of the Santa Ana River Watershed.

Enforcement Action

There was no enforcement action during this reporting period.

7.4.2.9 Yucaipa Valley Water District (YVWD)

Description of YVWD

YVWD is a Water District responsible for the implementation of certain pretreatment program activities for the industries connected to the Brine Line within its service area. Currently there are no permitted users within the YVWD service area. YVWD was formed on September 14, 1971, when the Secretary of State of California certified and declared formation of the District. The District operates under the County Water District Law, being Division 12 of the State of California Water Code. Although the immediate function of the District at the time was to provide water service, the YVWD currently provides a variety of services to residential, commercial and industrial customers. The YVWD provides sewer collection and sewer treatment services. Sewer treatment takes place at the highly advanced Wochholz Regional Water Recycling Facility that provides advanced treatment, including the capability to demineralize the recycled water. The demineralization process involves a reverse osmosis system that separates small molecules from the recycled water supply. In 2012, the YVWD completed the extension of the Inland Empire Brine Line operated by the Santa Ana Watershed Project Authority. The brine disposal facility is critical to insure

the YVWD meets the stringent water quality objectives set by the Regional Water Quality Control Board for the Yucaipa Management Zone, Beaumont Management Zone and the San Timoteo Management Zone.

Although YVWD currently has no permitted industries discharging to the Brine Line they have participated in Brine Line activities, including training conducted by SAWPA personnel, since 2013. They conduct the industrial user survey upstream of the Henry Wochholz Regional Water Recycling Facility that began discharge to the Brine Line in July 2016, in accordance with SAWPA policies and procedures.

Enforcement Action

There was no enforcement action during this reporting period.

7.4.3 Self-Monitoring Program

A self-monitoring program is required of permittees discharging to the Brine Line. The self-monitoring reports (SMRs) are delivered to the applicable agency for review and action if required. The SMR water quality data is included in the SAWPA Data Management System.

7.4.4 Field Inspection, Sampling, and Monitoring QA/QC

SAWPA conducts sampling QA/QC in accordance with EPA requirements including equipment blanks and field blanks. Analysis of the QA/QC data indicated samples collected were representative and free of contamination.

7.4.5 Identification of New Permittees

SAWPA requires a wastewater discharge permit for all facilities with discharge to the Brine Line, except for certain areas in the JCSD and Western service areas, therefore new permittees are identified upon their completion of a wastewater discharge permit application. Most new companies identified by SAWPA or upstream agencies in areas upstream of emergency connections are discovered by field inspectors responding to completed industrial user surveys that indicate an inspection is warranted or during inspections of previously unoccupied warehouse and facility spaces. Facilities identified upstream of emergency connections requiring a permit are responded to by the upstream agency with oversight by SAWPA. These permitted facilities are listed in the corresponding agency's Annual Reports.

The City of Beaumont

In the Beaumont service area upstream of the City of Beaumont wastewater treatment plant, Beaumont checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by Beaumont as required. Beaumont obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires are completed by new water/sewer customers, the IUS is verified by site inspections
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks.

Eastern Municipal Water District

In the EMWD service area all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by EMWD and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

Inland Empire Utilities Agency

In the IEUA service area, IEUA collaborates with the City of Chino to identify industries that may be subject to Federal Categorical Standards or local limits. No industries are allowed to connect to the Brine Line until they have entered into a capacity right agreement with IEUA and obtained a wastewater discharge permit issued by IEUA and SAWPA as required. IEUA in partnership with the City of Chino obtains new business information from the following

- City business licensing departments
- Industrial User Survey questionnaires
- City utility service requests
- City referrals during stormwater inspections

Most new companies that could potentially connect to the Brine Line are identified by IEUA field inspectors while out inspecting current permittees and when following up on tips provided by the City of Chino Source Control Division.

Jurupa Community Services District

In the JCSD service area, SAWPA checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by SAWPA and JCSD as required. SAWPA or JCSD obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires are completed by new water/sewer customers, the IUS is verified by site inspections
- Agency utility service requests and high-water users are inspected for wastewater generating activities
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks

JCSD will conduct regular inspections of all customers connected to the Inland Empire Brine Line (Brine Line) to verify the type of wastewater generated at their location. In addition, any closed-circuit TV (CCTV) revealing a possible illegal connection will be investigated. The majority of new companies identified by SAWPA or upstream agencies in these scenarios are discovered by field inspectors responding to completed industrial user surveys that indicate an inspection is warranted or during inspections of previously unoccupied warehouse and facility spaces. A priority determination is assigned as follows: High Priority – any non-permitted facility generating industrial wastewater is inspected and monitored annually for local limits, Medium Priority – any dry manufacturing facility is inspected every 2 years unless changes to manufacturing and Low Priority – warehouse/commercial business is inspected every 5 years. Facilities identified in the JCSD service area requiring a permit is reviewed by SAWPA with final permit concurrence by OC San. Facilities identified upstream of emergency connections in other jurisdictions requiring a permit are reviewed to by the upstream agency with oversight by SAWPA.

San Bernardino Municipal Water Department

In the SBMWD service area all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by SBMWD and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

San Bernardino Valley Municipal Water District

In the Valley District service area, all new proposed connections must complete a permit application that is thoroughly reviewed by Valley District and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit.

Western Municipal Water District

In the Western service area, except for the areas upstream of the Corona WRF No. 1 and WRCWRA SRPS, all new proposed connections or proposed new indirect dischargers must complete a permit application that is thoroughly reviewed by Western and SAWPA prior to developing a permit. The draft permit is then reviewed and commented on by SAWPA and OC San before issuing a final permit. For the Corona WRF No. 1 emergency discharge connection, Western directs the City of Corona, with oversight by SAWPA, through their industrial wastewater survey process. The City of Corona is alerted of any new business moving into their jurisdiction through the building department and business license process. New businesses are given a pretreatment questionnaire which is returned to the Source Control Department and reviewed. Source Control personnel visit the site to verify the information submitted in the questionnaire.

In the Western service area with potential to discharge to the Brine Line in an emergency condition from the WRCRWA SRPS, WRCRWA checks for various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by WRCRWA agencies as required. WRCRWA obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires completed by new water/sewer customers, with verification by site inspections
- Agency utility service requests and high-water users are inspected for wastewater generating activities
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks

Yucaipa Valley Water District

In the YVWD service area upstream of the Henry Wochholz Regional Water Recycling Facility, YVWD checks various sources for companies that may be subject to Federal Categorical Standards or local limits. Wastewater permits are issued by YVWD as required. YVWD obtains new business information from the following:

- The building department and business license process
- Industrial User Survey (IUS) questionnaires completed by new water/sewer customers, with verification by site inspections
- Agency utility service requests and high-water users are inspected for wastewater generating activities
- Industry, trade, or association magazines
- Internet searches & field observations
- New construction/tenant improvement – plan checks

7.4.6 Future Projects That Will Affect Quantity of Discharge to the Brine Line

California Institution for Women (CIW) which is primarily domestic (reclaimable) wastewater will be diverted to the Pine Avenue Sewer, away from the Brine Line, when the diversion project is completed.

Diversion of the CIW wastewater to the Pine Avenue Sewer away from the Brine Line is anticipated for Fiscal Year 2022/2023.

Eastside Water Treatment Plant is currently undergoing a plant expansion to double their water production capacity at the existing plant. The plant will also be constructing a lateral to directly connect to the Brine Line. The anticipated completion of construction for the expanded plant will be third quarter of Fiscal Year 2022/2023.

In-N-Out Burger, Chino Distribution Center (INO) is a new facility in the City of Chino that will generate wastewater from INO's meat processing and spread/sauce production. The facility is currently in construction and will begin operations in the third quarter of Fiscal Year 2022/2023.

7.4.7 SAWPA Special Projects

SAWPA conducted the following special project efforts during the reporting period:

1. Right of way (ROW) maintenance – 7.66 miles of easements were maintained.
2. Pipeline Inspection and Cleaning – Reach IV-A Upper and Reach V.
3. Repair of 14 Maintenance Access Structures (MAS) on Reach IV-A for corrosion.
4. Overhaul and valve exercise for 52 Air/Vac structures on Reach V.
5. Exercised main line valves on Reach V.
6. 291 USA tickets marked.

Table 7.4 Summary of SAWPA Special Projects, July 1, 2021 – June 30, 2022 Santa Ana Watershed Project Authority Orange County Sanitation District, Resource Protection Division									
Activity	Reach IV	Reach IV-A Lower	Reach IV-A Upper	Reach IV-B Lower	Reach IV-B Upper	Reach IV-D	Reach IV-E	Reach V	Corona Lateral
ROW Maintenance	2.69 Miles	2.19 Miles	1,656 Feet	2.1 Miles					1,404 Feet
Line Inspection								1,000 Feet	
Line Cleaning			6,800 Feet						
MAS Inspection	18	18	42	18	33			8	
MAS R&R			14						
Pot Holing								8	
Frame and Cover R&R			20						

7.4.8 SAWPA Member and Contract Agency Ordinances and Resolutions

- SAWPA adopted Ordinance No. 8 and Local Limits Resolution 2017-11 on September 19, 2017.
- EMWD adopted EMWD Ordinance No. 91.3, incorporating the changes made for SAWPA Ordinance No. 8 on May 2, 2018.
- IEUA adopted IEUA Ordinance No. 106, incorporating the changes made for SAWPA Ordinance No. 8 on February 21, 2018.

- JCSD adopted the JCSD Brine Line Ordinance 423 on January 8, 2018, incorporating the changes made for SAWPA Ordinance No. 8. JCSD adopted JCSD Brine Line Ordinance 424, incorporating the changes made for SAWPA Resolution 2017-11 on January 22, 2018.
- SBMWD adopted SAWPA Resolution No. 2017-11 with SBMWD Resolution No. 918 on October 17, 2017. SBMWD adopted SAWPA Ordinance No. 8 with SBMWD Resolution No. 919 on October 17, 2017.
- Valley District adopted Valley District Ordinance No. 80, incorporating the changes made for SAWPA Ordinance No. 8 on June 19, 2018.
- Western adopted Western Brine Line Ordinance No. 389, incorporating the changes made for SAWPA Ordinance No. 8 on March 21, 2018.
- YVWD adopted SAWPA Ordinance No. 8 by Resolution on October 3, 2017. YVWD adopted SAWPA resolution No. 2017-11 by Resolution on February 6, 2018.

7.4.9 Public Participation

None.

7.4.10 Permittees in Significant Noncompliance

Table 7.5 Summary of SAWPA and Member/Contract Agency Permittees in SNC July 1, 2021– June 30, 2022 Sana Ana Watershed Project Authority Orange County Sanitation District, Resource Protection Division		
Company Name	Permit No.	Reporting or Discharge Violation
EMWD Permittees		
None		
IEUA Permittees		
None		
JCSD Permittees		
None		
SBMWD Permittees		
None		
Valley District Permittees		
None		
SAWPA Permittees		
None		
Western Permittees		
None		

7.4.10.1 Summary of Permittees in SNC Newspaper Notice

There were no Permittees in Significant Noncompliance.

7.4.11 Non-Industrial Source Control and Public Education Programs

EMWD supports an extensive education program designed to provide a useful academic experience at all grade levels.

IEUA educates its permittees during site inspections when applicable for typical outreach efforts such as FOG and hazardous waste education.

JCSD’s Pretreatment staff coordinates public outreach in cooperation with JCSD’s Community Affairs Staff. The public outreach occurs in community newsletters, public outreach events such as JCSD’s Open House and Wellness Events, and JCSD’s website. Topics include FOG Control, root control, hazardous waste

disposal and Sewer System Management Plan components. Information is provided to the dischargers during the permit renewal process and site inspections.

SBMWD implements a number of outreach programs to educate industry and to minimize pollutants discharged. Field inspectors provide Best Management Practice (BMP) brochures during site inspections to educate industry and minimize the discharge of pollutants. SBMWD operates a quarterly Silver Waste Disposal Program to provide a disposal site for small quantity silver generators within the service area.

Valley District provides public educational information to their customers to encourage the efficient use of water through advertising, classroom instruction, contests, paying 25% of retail water agency rebates, etc. In collaboration with its retail water agencies, iEfficient.com was created, which provides water-saving tips and information on water issues. Valley District conducts regular Board Meetings which are open to the public on the 1st and 3rd Tuesday of each Month. Valley District also provides public information via their website at <http://www.sbvmd.com/> which includes scheduled events and other opportunities for public participation on a variety of issues.

Western provides public educational information to their customers to encourage the efficient use of water through advertising, rebates, programs, and workshops.

7.4.12 Other Public Participation

SAWPA Agency Dental Amalgam Programs

City of Beaumont (Beaumont)

The Beaumont Wastewater Treatment Plant (WWTP) has no direct connections from dental facilities within their jurisdiction. Beaumont has one permit, issued by SAWPA, for the Beaumont WWTP that discharges Brine Wastewater from a reclamation process for the wastewater treatment plant. For the area that discharges to the Beaumont WWTP, Beaumont identified 14 dental facilities in the service area, 4 of which are non-amalgam users such as orthodontics. Beaumont has on file Dental Discharger Compliance Reports for all 14 dental facilities. Each facility is inspected annually.

Eastern Municipal Water District (EMWD)

EMWD has no areas of discharge to the Brine Line which have dental facilities.

Inland Empire Utilities Agency (IEUA)

IEUA has no direct connections from dental facilities within their jurisdiction. In the event an emergency discharge event occurs, which requires IEUA to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the IEUA regional plants. IEUA has completed the inventory of dentists that discharge from this area which includes portions of the cities of Chino and Chino Hills. IEUA has sent the one-time compliance report (OCTR) survey to these dental facilities. A second and third round of the OCTR surveys were sent to non-respondents in November 2019 and February 2020, respectively. IEUA placed phone calls to remaining non-respondent dental facilities during August and September 2020. IEUA sent another round of OCTR surveys to non-respondent dental facilities in October 2020. IEUA and their member cities reached out to the non-respondent dental facilities in June 2021. Since June of 2021, IEUA received two (2) OCTR reports from new dental facilities and confirmed closure of three (3) facilities within the cities of Chino and Chino Hills. To date approximately 97% of the OCTR surveys have been received from dental facilities identified within the cities of Chino and Chino Hills.

Jurupa Community Services District (JCSD)

JCSD has no dental facilities from the areas with direct connections to the Brine Line. In the event an emergency discharge event occurs, which requires JCSD to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the WRCRWA or City of Riverside Treatment Plants. JCSD has issued surveys to all dental facilities that discharge within the service areas that require a letter to discharge to the Brine

Line. All open facilities have submitted their one-time compliance report (OTCR) and have been inspected to verify compliance.

San Bernardino Municipal Water Department (SBMWD)

There are no dental facilities within the SBMWD service area which have a direct connection to the Brine Line. In the event an emergency discharge event occurs, which requires the SBMWD to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge to the SBMWD Water Reclamation Plant. The SBMWD Environmental Control Section has actively implemented a Dental Amalgam Program beginning in 2016 with 155 dental facilities identified within the service area. All the facilities have been inspected with one hundred and fifteen (115) dental industrial users submitting the required compliance report and the remaining forty (40) facilities determined to have either ceased operations or have not been classified as dental industrial users (i.e., dental imaging only, veterinarian clinics, orthodontics only). In 2021, SBMWD Environmental Control conducted inspections which identified one hundred and two (102) active dental facilities with the required compliance reports on file and fifty-three (53) facilities determined to have ceased operations or are not classified as dental industrial users.

San Bernardino Valley Municipal Water District (Valley District)

Valley District has no areas of discharge to the Brine Line which have dental facilities.

Western Municipal Water District (Western)

Western has no direct connections from dental facilities within their jurisdiction. In the event an emergency discharge event occurs, which requires WMWD to request authorization to discharge to the Brine Line through a Letter to Discharge, the wastewater would include discharge from dental industrial users which normally discharge from the following service areas:

- **Corona WRF No. 1.**

Corona has moved from the preliminary survey to on-going monitoring via the new business license list that is received monthly. Corona is still doing on-going monitoring of all dental offices coming in. There are a total of 120 facilities that are being tracked and Corona still monitors new and used business licenses to ensure all dental offices are submitting the proper documentation.

- **WRCRWA SRPS**

WRCRWA has four agency jurisdictions that discharge to the WRCRWA SRPS: Western, Home Gardens, City of Norco, and intermittently, City of Corona. The Western area is residential, and no dental facilities have been identified. Home Gardens has issued surveys to all dental facilities that discharge to the WRCRWA SRPS from within their jurisdiction. All dental facilities have been surveyed and have been made aware of the dental amalgam rule. Currently, no dental offices within Home Gardens use Amalgam. The City of Norco has identified all the dental facilities that discharge to the WRCRWA SRPS from within their jurisdiction and has issued surveys to these facilities. At this time twelve surveys have been returned. The City of Norco is currently in the process of reaching out to the facilities that have yet to return a survey to determine if they are still in business.

Yucaipa Valley Water District (YVWD)

YVWD has no direct connections from dental facilities within their jurisdiction. YVWD has one permit, issued by SAWPA, for the Henry Wochholz Water Reclamation Facility that discharges Brine Wastewater from a reclamation process for the wastewater treatment plant. For the area that discharges to the YVWD Henry Wochholz Water Reclamation Facility YVWD has received all the surveys back.

7.4.13 Changes to the SAWPA Pretreatment Program

SAWPA has continued to refine a new Pretreatment Program developed in 2013. SAWPA staff consists of a Manager of Permitting and Pretreatment, a Pretreatment Program Specialist, with an additional 1.2 full-time equivalent consisting of other SAWPA personnel. SAWPA oversees the Brine Line program with

assistance from Pretreatment Program managers, senior management, and inspectors from the Member and Contract Agencies. A full description of personnel available to the Brine Line program is detailed in 7.4.14.

Two working groups made up of 1) Pretreatment Program managers; and 2) managers and senior management met during the year to coordinate work of the Pretreatment Program team. Working group meetings are utilized to review Brine Line procedures, discuss upcoming pretreatment issues, and provide training on various topics related to the program. SAWPA continued an Inter-Agency training program to promote the continued growth of all agency inspectors. Inspectors from each agency accompany a different agency on an inspection each quarter to observe inspection practices, but also see new types of facilities, broadening each inspector's experience.

SAWPA conducted the Semi-Annual Brine Line Audit with the distributed pretreatment program administered by the SAWPA Agency staff. SAWPA compiled the individual agency audit reports and issued these to each Agency in December of 2021. During these audits SAWPA personnel ensure agencies were performing inspection, monitoring, permitting, and enforcement activities in line with the SAWPA policies and procedures. SAWPA personnel reviewed documentation for completeness, accuracy, and adherence to SAWPA policies and consistency between agency programs. SAWPA observed no major findings at any of the member or Contract Agencies.

SAWPA Draft Pretreatment Program Control Documents Submittal

SAWPA Submitted draft updates to the Pretreatment Program Control Documents (PPCDs), also known as the SAWPA Policy and Procedures, for OC San's review on April 2, 2018. These documents have been updated to incorporate OC San's outstanding comments from their 2013 review of the PPCDs, to incorporate changes due to SAWPA Ordinance No. 8 and Local Limits Resolution 2017-11, as well as to incorporate any program changes SAWPA has made since 2013. SAWPA also engaged OC San regarding a potential Stormwater Policy based on the OC San Business Washpad Rule. SAWPA's intent was to employ the Policy requiring a SOP for facilities that had potential to discharge stormwater as outlined in the draft Policy. SAWPA has previously shared the draft Stormwater Policy with OC San. SAWPA understands that OC San wished to withhold any potential concurrence on this document until a template SOP for the Stormwater Policy could be reviewed. These documents were submitted alongside the Draft Pretreatment Program Control Documents submittal on April 2, 2018. In a letter dated February 15, 2019 OC San responded to the April 2, 2018 Draft Pretreatment Program Control Documents submittal with submittal review comments. SAWPA and OC San have met to review these comments in more detail however it was agreed that work on the PPCDs should wait until completion of Ordinance No. 9.

OC San has completed the process of updating and revising their Sewer User Ordinance, Ordinance OCSD-53. As Delegated Control Authority to OC San, SAWPA is required to update their Ordinance to include relevant OC San revisions. SAWPA has developed draft Ordinance No. 9, which has been revised to incorporate the updates within the new OC San Ordinance. The proposed updates include a new prohibition on hydrolysate, a new prohibition on discharge via non-domestic surface or floor drains, and clarification of existing language for facility reports of changed conditions and notifications for sale of change of ownership. Additionally, SAWPA has proposed additional revisions to update the definition of an Industrial User to standardize it with the OC San definition. Furthermore, SAWPA has proposed creation of a new classification of Non-Industrial User for Brine Line dischargers that do not meet the definition of an Industrial User. SAWPA has also created a new authorization process, a Connection Authorization, that will allow greater flexibility in managing infrequent discharges to the Brine Line. SAWPA submitted the most recent draft of Ordinance No. 9 to OC San on November 6, 2020 and have been working collaboratively with OC San throughout the years to further refine this revision.

7.4.14 Pretreatment Program Budget

Staffing – EMWD

As of June 30, 2022, the Pretreatment Program staff consisted of 1 manager, 1 senior analyst, 1 analyst, 2 senior inspectors, and 5 field inspectors, for a total of 10 staff members. The total estimated budget for Brine Line FY 2021/22 was \$374,020.

Staffing – IEUA

As of June 30, 2022, the Pretreatment Program staff consists of 1 director, 1 manager, 1 engineer, 4 field inspectors, and 1 administrative support personnel for a total of 8 staff members. The total estimated budget for FY 2021/22 was \$1,553,337. This represents the total estimated budget dedicated to Brine Line activities.

Staffing – JCSD

As of June 30, 2022, the Pretreatment Program staff consists of 1 supervisor, 2 field inspectors and a sewer sample technician for a total of 4 staff members. The JCSD Pretreatment Budget for FY 2021/22 was \$284,290 for the Brine Line Service Area. The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

Staffing – SBMWD

As of June 30, 2022, the Pretreatment Program staff consists of 1 manager, 3 field technicians, 1 collection station operator, and 1 administrative support personnel for a total of 6 staff members. Total budget for the entire Pretreatment Program including the brine program for 2021/22 for staff and equipment was \$781,288. The Agency does not differentiate within its budget between Brine Line and non-Brine Line activities.

Staffing – Valley District

As of June 30, 2022, the Pretreatment Program staff consists of 1 manager and 2 consultant provided personnel for a total of 3 staff members. The consulting budget for FY 2021/22 was \$72,078, which includes the sampling and monitoring costs. Valley District management time is estimated at approximately 10% of the program implementation budget, or \$7,208. The Agency does not track time to differentiate between Brine Line and non-Brine Line activities. Total cost for FY 2021/22 was approximately \$79,286.

Staffing SAWPA

As of June 30, 2022, the Pretreatment Program staff consisted of 1 manager, and 1 specialist. An additional 1.2 FTE is contributed from 1 engineer, and 6 technical support personnel. The actual Brine Line Pretreatment Program activity expenditures for FY 2021/22 were \$942,687.

Staffing – Western

As of June 30, 2022, the Pretreatment Program staff consists of 1 manager, and 1 specialist, and 1 technician for a total of 3 staff members. Estimated budget for FY 2021/22 was \$300,000 (this figure does not include sampling costs, which are assigned to the customer as a pass-through charge). The District does not differentiate within its budget between Brine Line and non-Brine Line activities.

7.4.15 Equipment Inventory Listing

The Summary of Pretreatment Equipment used by and available to SAWPA in Pretreatment Activities, such as field inspection and sampling activities, is provided in the following table. The quantities listed in each Member and Contract Agency column below represents the total resources available for Brine Line activities. The Member and Contract Agencies do not track time to differentiate between Brine Line and non-Brine Line activities or resource allocations. A summary of the pretreatment equipment used by the dischargers is shown in Appendix H titled “SAWPA Pretreatment Program Permittees with Pretreatment Equipment.”

Table 7.6 Santa Ana Watershed Project Authority – Summary of Pretreatment Equipment for Fiscal Year 2021/22

Santa Ana Watershed Project Authority
Orange County Sanitation District, Resource Protection Division

Equipment Description	Quantity					
	EMWD	IEUA	JCSD	SBMWD	SAWPA	Western
Vehicles	7	4	3	3	2	8
Automated Samplers	11	18	9	15	6	13
Handheld Portable Samplers	-	-	2	5	1	-
Sampler Batteries	24	35	18	31	5	5
Sampler Battery Chargers	12	18	2	4	1	1
Sampler Battery Power Packs	4	-	-	-	1	1
Portable Area/Velocity Flow Meters	6	5	5	-	-	-
Gas Meters/Detectors with Pumps	7	4	-	2	1	2
Laboratory Dishwashers	-	1	1	-	-	-
Ice Machines	1	1	2	1	1	3
Portable pH Meters	6	8	4	6	1	2
Sulfide Test Kits	1	7	1	2	1	1
SONDE Trunk Line Monitoring Devices	-	4	-	-	-	-
Laptop Computers	6	4	1	3	2	3
Continuous H ₂ S Trunkline Monitoring Devices	-	7	-	-	-	-
Spill Response Kits	-	5	-	3	-	1

7.4.16 SAWPA Pretreatment Program Training

SAWPA, Beaumont, EMWD, IEUA, JCSD, SBMWD, Valley District, Western and YVWD staff attended training classes and workshops presented by the California Water Environment Association (CWEA), including the P3S conference, and Southern California Alliance of Publicly Owned Treatment Works (SCAP) pretreatment committee meetings.

Interagency training was conducted each quarter throughout the 2021/22 fiscal year to promote the continued growth of all agency inspectors. Inspectors from each agency accompany a different agency on an inspection each quarter to observe inspection practices, but also see new types of facilities, broadening each inspector’s experience.

Additional training was conducted throughout the 2021/22 fiscal year by SAWPA for member/Contract Agencies. The following training classes were conducted with all SAWPA agencies represented:

- SAWPA iPACS Water Quality (WQ) Data Entry Training – November 18, 2021
- SAWPA iPACS Inspection Documentation Refresher – April 21, 2022

Chapter 8. Solids Management Program

8.1 Introduction

This section provides an overview of OC San’s Biosolids Program, focusing on biosolids quality with respect to metals. Biosolids are nutrient-rich, treated organic matter recovered through the treatment of wastewater. These solids are considered a resource because of their nutrient and energy values, and they are recyclable in part because of their low metal content. The pretreatment program is a key element in ensuring the recyclability of OC San’s biosolids by minimizing the discharge of heavy metals and other undesirable constituents into the collection system and ultimately the treated solids, which are used to fertilize farms.

OC San’s annual biosolids compliance report was completed, submitted to regulators, and posted online in February 2022. Visit www.ocsan.gov/503 to access the most recent document that contains Biosolids Program information, regulations, quantities, policies, guiding principles, and how and where biosolids are recycled.

8.2 Biosolids Quality

Biosolids quality plays an important role in ensuring the continued recyclability of OC San’s biosolids. OC San’s pretreatment program has been extremely effective in reducing and maintaining levels of pollutants (e.g., OC San’s influent sewage meets drinking water standards for the biosolids monitoring metals). The ceiling concentrations and EQ concentrations promulgated by the US EPA’s biosolids regulations (40 CFR 503) are presented in Figure 8-1 through Figure 8-10 as a reference. For FY 2021/22, OC San biosolids met EQ limits for all the regulated parameters as shown in Table 8.1.

Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
Arsenic	2012-13	41	0	7.8	4.7	2.0	10	7.0
	2013-14*		3.5	9.5	5.8	5.4	11	8.4
	2014-15		4.5	11	7.2	7.8	12	9.3
	2015-16*		6.3	12	8.3	6.2	12	9.2
	2016-17*		6.7	12	8.1	5.6	12	8.6
	2017-18*		7.2	16	9.9	7.9	16	11
	2018-19*		7.3	24	16	9.4	24	18
	2019-20*		1.3	8.8	5.4	1.3	12	5.5
	2020-21*		1.3	14	8.9	1.2	19	12
2021-22	7.3	10.5	8.6	9.8	13.5	11		
Cadmium	2012-13	39	2.6	7.8	4.7	1.9	4.4	3.1
	2013-14*		1.6	11	3.9	2.1	6.0	3.5
	2014-15		2.7	7.8	5.1	3.1	5.8	4.0
	2015-16*		1.3	4.7	2.5	2.0	4.5	3.0
	2016-17		2.6	3.1	2.3	2.0	3.8	3.0
	2017-18*		1.7	4.4	3.0	2.5	7.7	5.1
	2018-19*		1.2	3.0	1.6	2.7	8.4	4.2
	2019-20*		1.3	2.7	1.9	2.2	8.4	3.3
	2020-21*		0.9	1.6	1.3	1.6	2.5	2.0
2021-22	0.6	1.5	1.1	1.1	1.4	1.3		
Chromium	2012-13	**	42	56	49	42	59	49
	2013-14		39	52	45	40	53	46
	2014-15		30	51	40	34	70	46
	2015-16		31	89	46	28	60	46
	2016-17		30	89	49	29	67	46
	2017-18		27	38	34	38	54	44

Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2021/22, in Milligrams per Dry Kilogram								
Orange County Sanitation District, Resource Protection Division								
Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
	2018-19		29	58	39	32	53	45
	2019-20		37	51	45	35	49	42
	2020-21		43	54	48	42	65	51
	2021-22		34	49	41	41	52	45
Copper	2012-13	1,500	480	640	540	500	640	540
	2013-14		460	540	510	470	540	500
	2014-15		320	570	470	320	560	470
	2015-16		380	560	460	340	570	480
	2016-17		400	560	460	340	570	490
	2017-18		320	500	420	380	590	460
	2018-19		355	600	470	335	665	510
	2019-20		440	600	530	410	590	490
	2020-21		470	660	530	420	520	460
2021-22	425	550	490	320	440	370		
Lead	2012-13	300	7.5	19	15	7.5	17	14
	2013-14*		13	18	14	13	17	14
	2014-15*		8.7	15	13	9.0	17	13
	2015-16*		8.3	20	12	8.0	17	13
	2016-17*		7.9	20	11	7.5	17	12
	2017-18*		8.9	19	12	10	16	13
	2018-19		9.9	15	12	10	15	13
	2019-20		9.8	14	12	14	24	17
	2020-21		2.2	15	6.8	2.7	18	7.5
2021-22	4.9	8.1	6.2	2.7	7.4	4.6		
Mercury	2012-13	17	0.7	4.1	1.5	0.8	3.8	1.4
	2013-14		0.8	1.2	1.0	0.7	2.8	1.4
	2014-15		1.0	1.5	1.1	1.0	1.5	1.0
	2015-16		0.6	1.7	0.9	0.6	1.2	1.0
	2016-17		0.5	1.7	0.9	0.7	1.2	0.9
	2017-18		0.7	1.1	0.9	0.3	1.1	0.8
	2018-19		0.6	1.1	0.9	0.6	1.0	0.8
	2019-20		0.5	1.2	0.8	0.5	0.8	0.6
	2020-21		0.5	1.0	0.7	0.4	0.9	0.6
2021-22	0.5	0.8	0.6	0.4	1	0.5		
Molybdenum	2012-13	**	9.8	20	14	12	20	15
	2013-14		12	18	15	14	18	15
	2014-15		9.4	18	15	12	20	16
	2015-16*		11	18	15	11	23	16
	2016-17		12	18	15	11	23	16
	2017-18*		10	16	14	13	18	15
	2018-19		13	20	16	15	22	18
	2019-20		14	22	18	14	24	18
	2020-21		15	21	18	17	23	20
2021-22	13	20	16	14	21	18		
Nickel	2012-13	420	34	48	40	23	41	30
	2013-14		36	55	43	28	56	37
	2014-15		26	47	37	26	41	34
	2015-16*		29	45	38	20	41	33

Table 8.1 Trends in Trace Metal Content of Biosolids, Fiscal Years 2012/13-2021/22, in Milligrams per Dry Kilogram Orange County Sanitation District, Resource Protection Division								
Metal	FY	EQ Limit	Plant 1			Plant 2		
			Min	Max	Avg	Min	Max	Avg
	2016-17		25	45	36	21	41	32
	2017-18		28	37	32	31	39	34
	2018-19		23	44	33	29	44	37
	2019-20		27	41	35	26	46	35
	2020-21		28	46	36	26	33	29
	2021-22		23	33	28	25	30	26
Selenium	2012-13	100	0	20	9.0	0	20	8.0
	2013-14*		3.5	13	7.9	4.2	13	8.3
	2014-15*		4.1	13	7.1	4.5	15	7.3
	2015-16*		4.4	11	8.1	3.7	10	7.6
	2016-17*		4.1	10	8.4	4.8	10	8.0
	2017-18*		3.0	7.8	4.9	2.7	8.0	4.9
	2018-19*		2.5	48	6.6	2.3	2.9	2.7
	2019-20*		0.9	12	3.7	0.9	12	3.5
	2020-21*		1.0	12	6.5	0.9	10	6.3
	2021-22		6.7	9.3	8.0	7.5	11	9.2
Silver	2012-13	**	6.2	14	8.6	6.4	13	8.6
	2013-14*		2.9	7.6	5.3	3.6	9.1	6.3
	2014-15*		3.3	7.8	5.8	3.4	8.6	6.5
	2015-16*		2.4	7.7	5.6	2.5	7.9	5.6
	2016-17*		2.7	5.6	4.4	2.5	6.8	4.9
	2017-18*		3.2	5.1	3.9	3.7	5.0	4.2
	2018-19*		2.9	5.1	4.0	3.5	5.8	4.3
	2019-20*		3.0	5.0	4.0	2.7	5.8	4.0
	2020-21*		2.6	3.8	3.3	2.5	3.2	2.7
	2021-22		2.1	3.6	2.6	1.4	2.5	1.9
Zinc	2012-13	2,800	640	860	720	680	880	770
	2013-14		590	730	670	620	750	700
	2014-15		420	720	620	470	740	670
	2015-16		500	770	620	520	890	730
	2016-17		550	770	610	520	890	740
	2017-18		470	680	600	590	910	720
	2018-19		520	810	600	500	790	720
	2019-20		640	810	760	590	890	720
	2020-21		710	875	800	680	780	740
	2021-22		675	835	790	655	745	690
ND	Non-detect							
*	Calculations included data below the reporting limit, but above the method detection limit, and were therefore flagged as “detected not quantified” or the method detection limit was substituted for non-detect values.							
**	US EPA’s extensive health risk analysis determined that no limits were needed for these metals (EPA 40 CFR 503).							

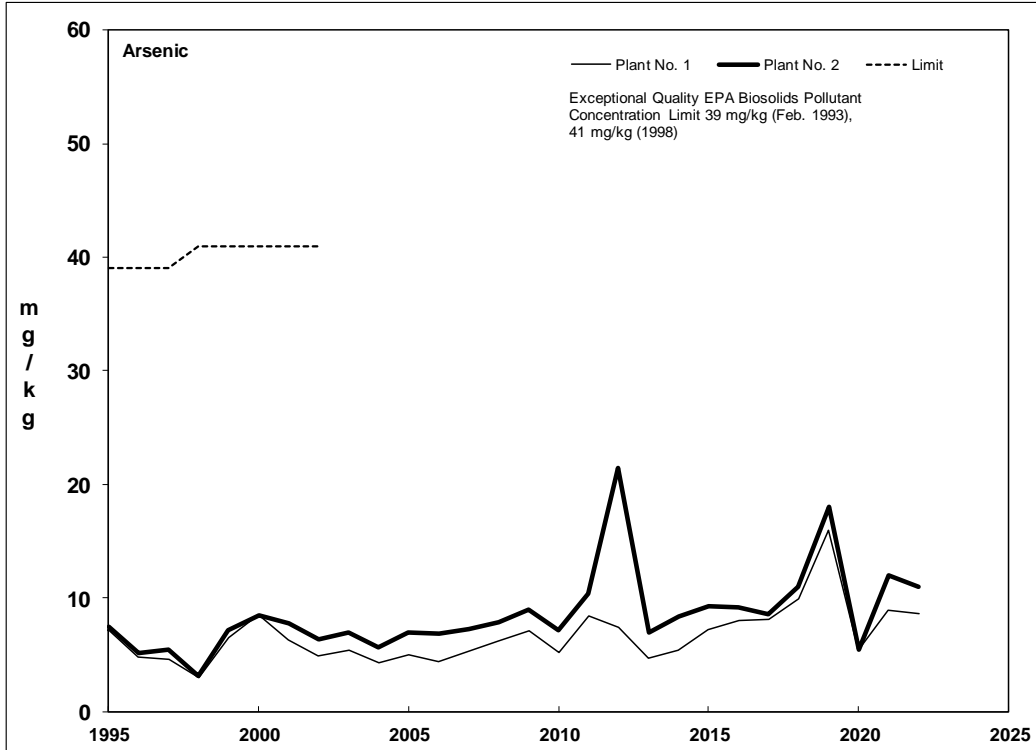


Figure 8-1 Trends in Concentrations of Arsenic in Biosolids, Fiscal Years 1994/95-2021/22
Orange County Sanitation District, Resource Protection Division

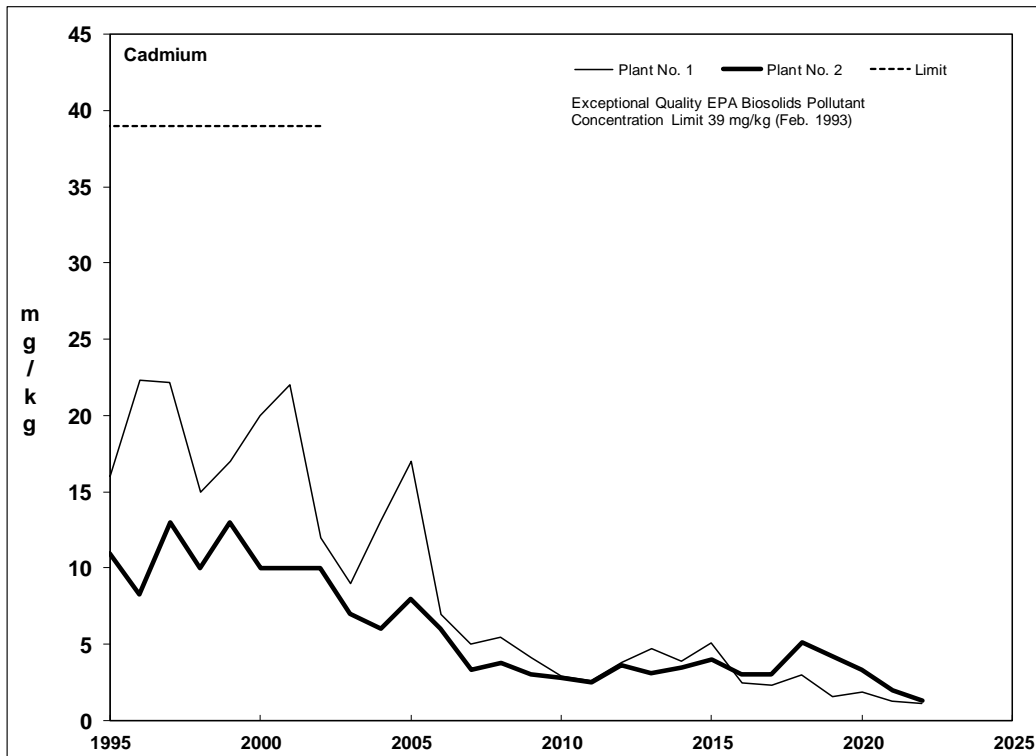


Figure 8-2 Trends in Concentrations of Cadmium in Biosolids, Fiscal Years 1994/95-2021/22
Orange County Sanitation District, Resource Protection Division

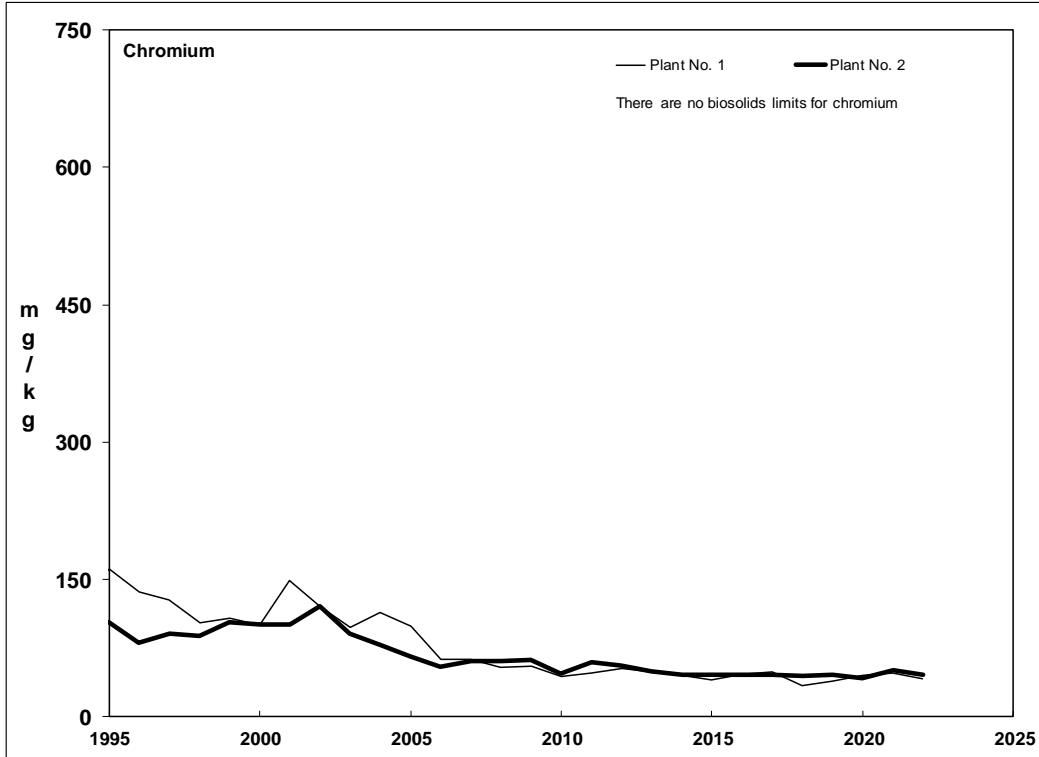


Figure 8-3 Trends in Concentrations of Chromium in Biosolids, Fiscal Years 1994/95-2021/22
Orange County Sanitation District, Resource Protection Division

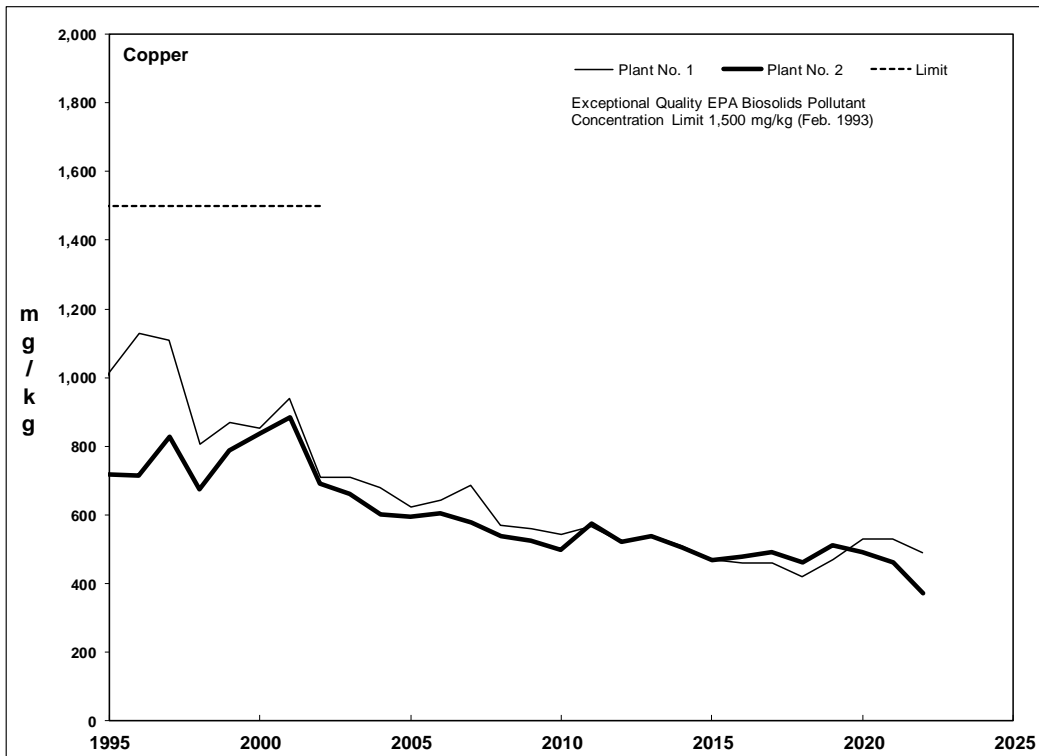


Figure 8-4 Trends in Concentrations of Copper in Biosolids, Fiscal Years 1994/95-2021/22
Orange County Sanitation District, Resource Protection Division

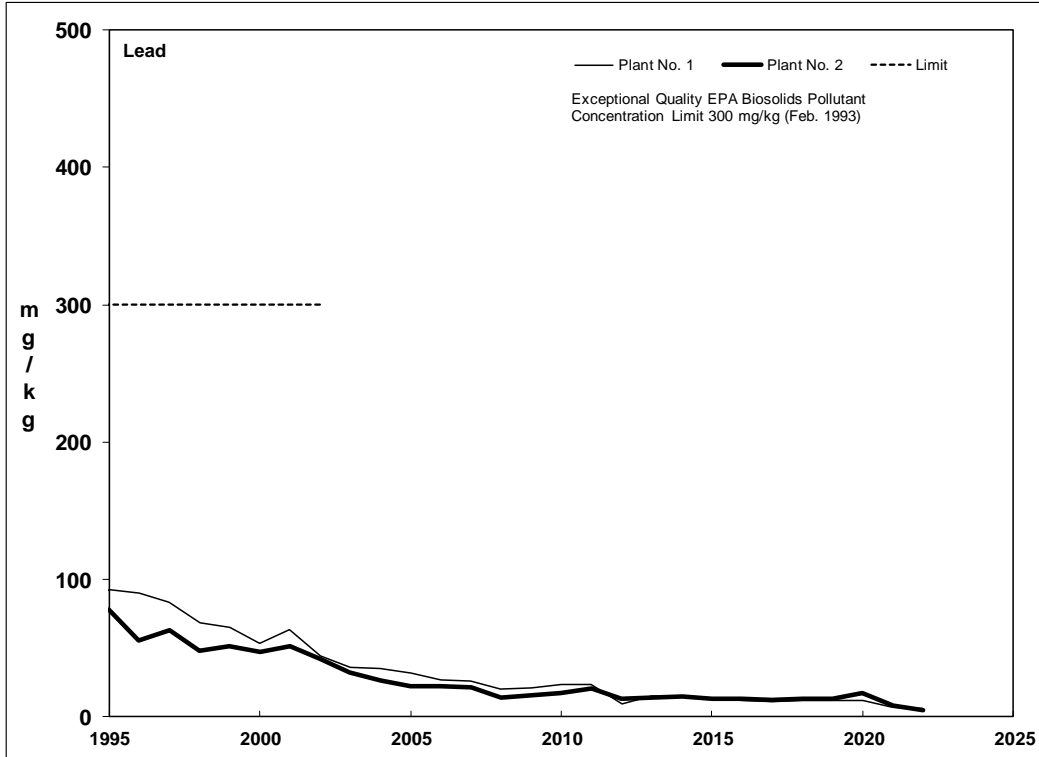


Figure 8-5 Trends in Concentrations of Lead in Biosolids, Fiscal Years 1994/95-2021/22
 Orange County Sanitation District, Resource Protection Division

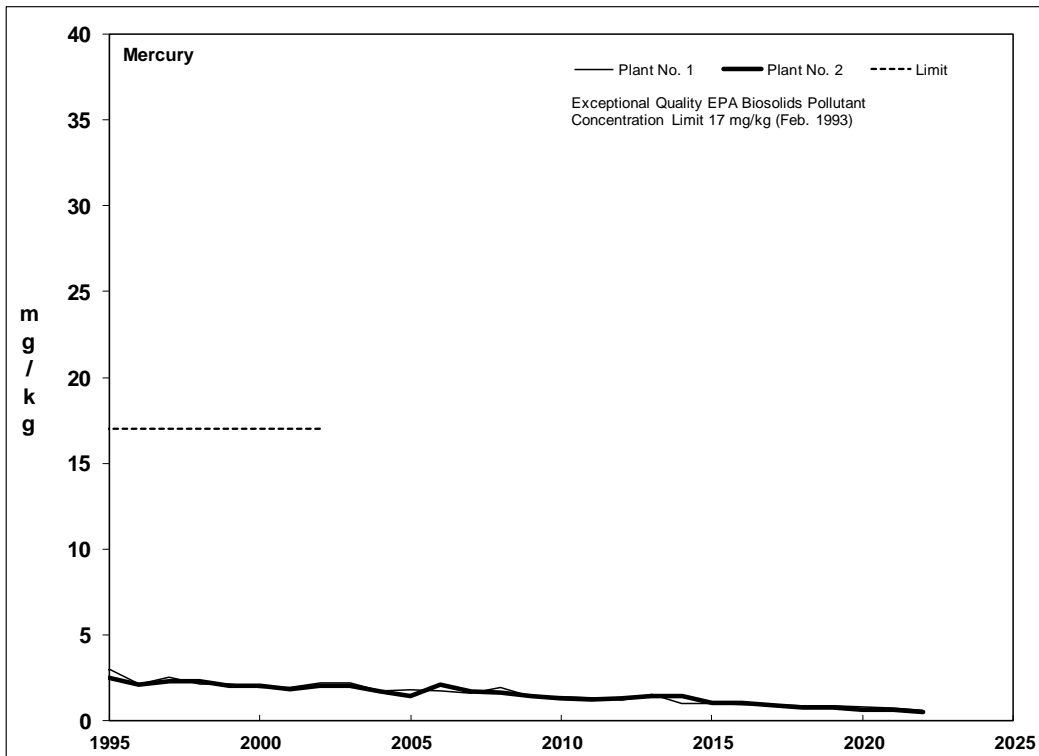


Figure 8-6 Trends in Concentrations of Mercury in Biosolids, Fiscal Years 1994/95-2021/22
 Orange County Sanitation District, Resource Protection Division

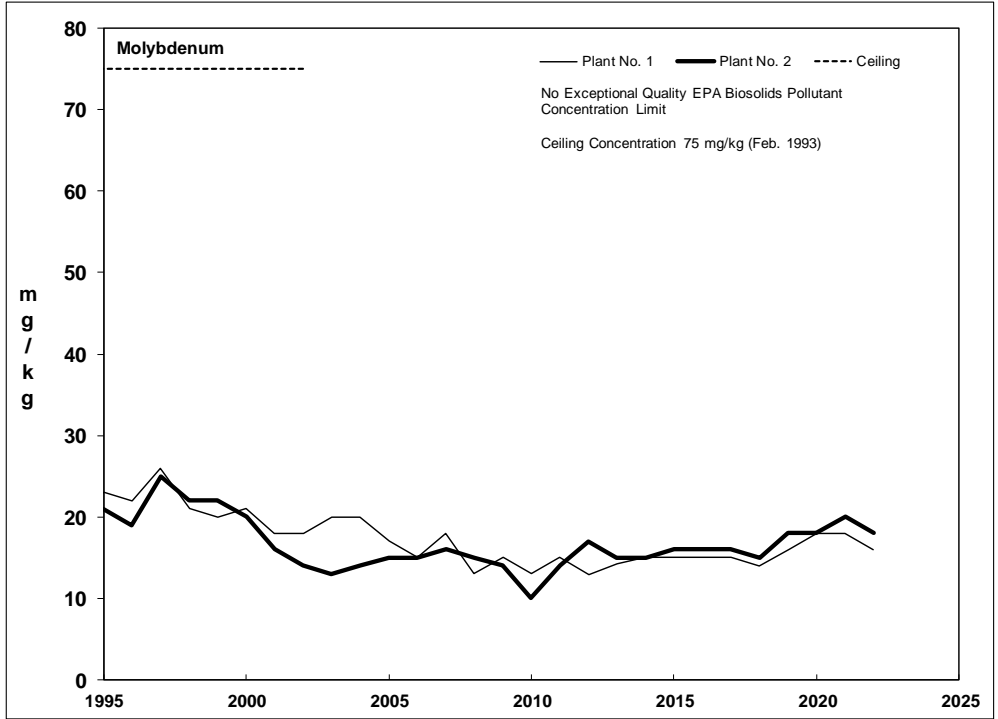


Figure 8-7 Trends in Concentrations of Molybdenum in Biosolids, Fiscal Years 1994/95-2021/22
 Orange County Sanitation District, Resource Protection Division

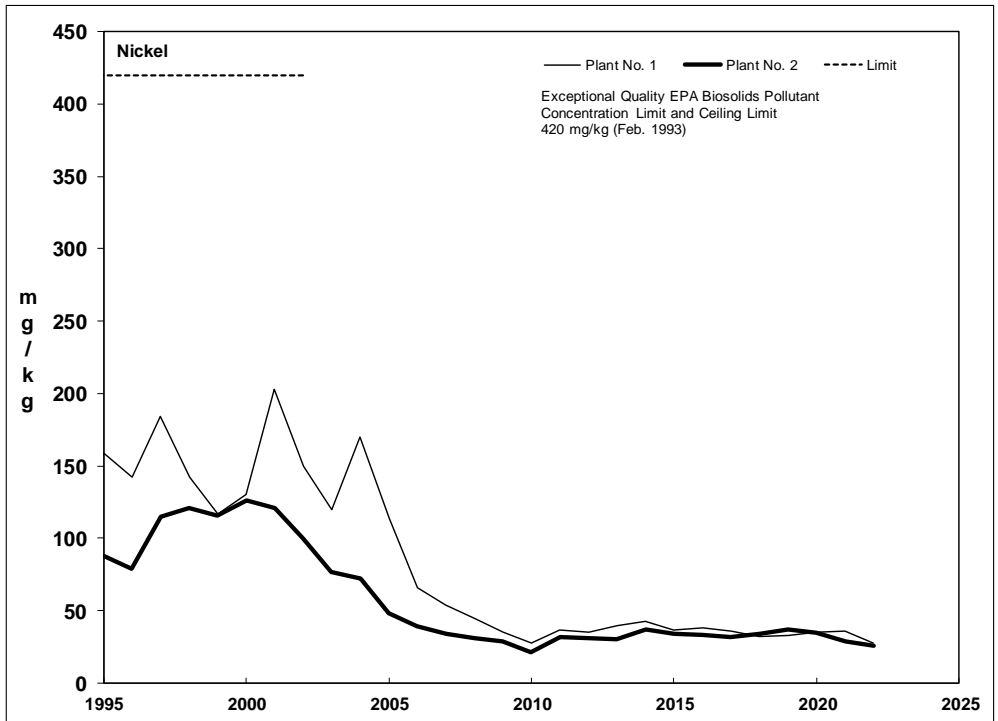


Figure 8-8 Trends in Concentrations of Nickel in Biosolids, Fiscal Years 1994/95-2021/22
 Orange County Sanitation District, Resource Protection Division

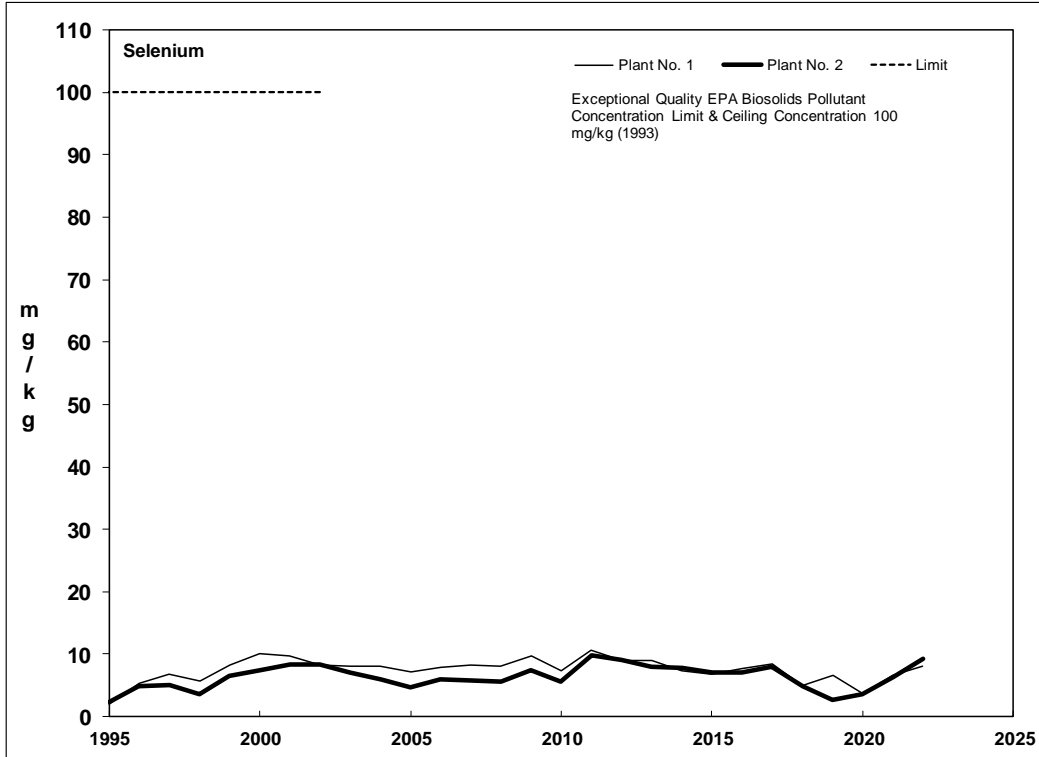


Figure 8-9 Trends in Concentrations of Selenium in Biosolids, Fiscal Years 1994/95-2021/22
Orange County Sanitation District, Resource Protection Division

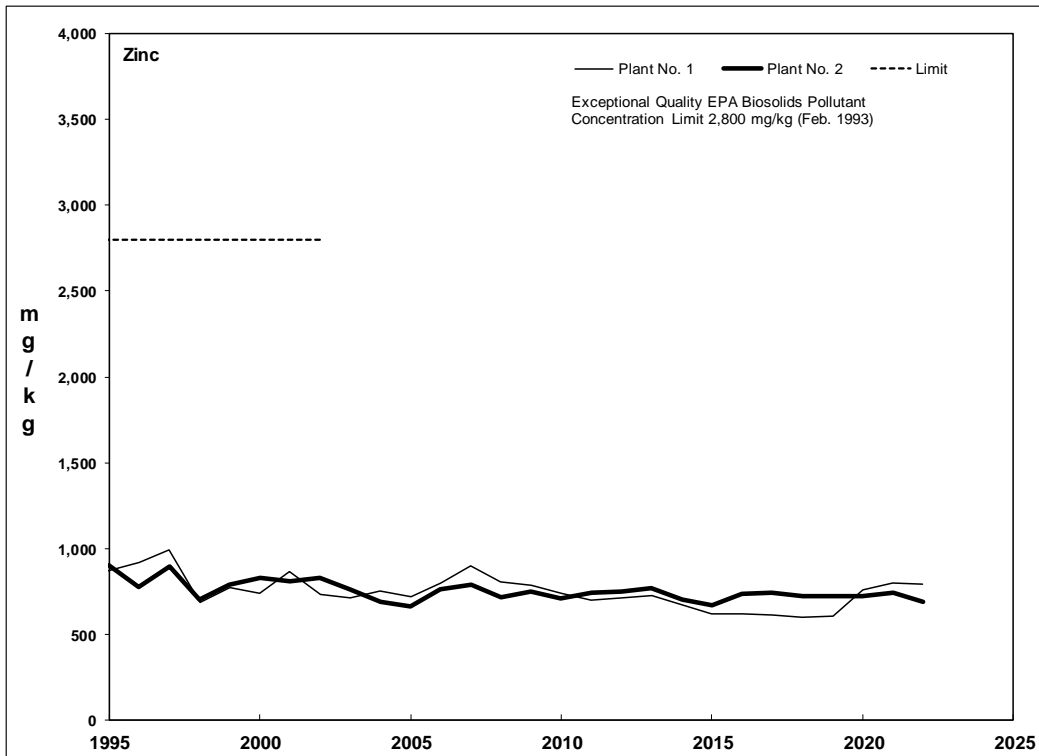


Figure 8-10 Trends in Concentrations of Zinc in Biosolids, Fiscal Years 1994/95-2021/22
Orange County Sanitation District, Resource Protection Division

Chapter 9. Non-Industrial Source Control and Public Education Programs

9.1 Introduction

OC San's approved Pretreatment Program was designed to address conventional pollutants which may impact OC San and its collection system, treatment works, workers, and compliance with its permits. The program also ensures that OC San can successfully implement its reuse initiatives, which had primarily included biosolids land application and some water reclamation through OCWD's Interim Water Factory 21. Since the early 2000s, OC San became involved with new programs, such as the Dry Weather Urban Runoff Diversion Program to assist Municipal Separate Storm Sewer System (MS4) permittees in helping keep our oceans clean and open for the public to use safely. OC San also continued its partnership with OCWD and replaced the Interim Water Factory 21 with the Groundwater Replenishment System (GWRS), which started producing nearly 70 MGD of reclaimed water a day starting in 2008. As a result of these new programs and more stringent requirements and regulations, OC San expanded the Pretreatment Program to also address non-industrial sources and nonconventional pollutants of concern. The expansion resulted in the formation of the Non-industrial Source Control (NISC) Group as a part of the Pretreatment Program. Over time, the NISC Group implemented projects and initiated programs to address emerging concerns or issues. Based on the program's goals and timing, the projects were incorporated into other parts of OC San's existing operations or were terminated when the need had been addressed. The current, active NISC programs are listed in Table 9.1.

Table 9.1 Non-Industrial Source Control Programs, FY 2021/22 Orange County Sanitation District, Resource Protection Division	
Programs	
Fats, Oils and Grease Control	
Radiator Repair Shops	
Dry Cleaners	
Dry Weather Urban Runoff Diversions	
Dental Amalgam	

9.2 Fats, Oils, and Grease (FOG) Control Program

9.2.1 Fats, Oils, and Grease Control

Background

A frequent cause of sanitary sewer overflows (SSOs) is grease accumulation in the small- to medium-sized sewer lines typically owned and operated by cities and local sewerage agencies. In April 2002, the California Regional Water Quality Control Board, Santa Ana Region (SARWQCB) issued Order No. R8-2002-0014, *General Waste Discharge Requirements* (WDR), which required Orange County cities and sewerage agencies, known as WDR Co-Permittees, to monitor and control SSOs. Specifically, the order required WDR Co-Permittees to develop a Sewer System Management Plan (SSMP), one element of which was a Fats, Oils, and Grease Control Program (FOG Control Program). On November 17, 2004, OC San passed FOG Ordinance No. OCSD-25 establishing the legal authority to prohibit food service establishments (FSEs) from discharging FOG to the sewer system. OC San implemented its FOG Control Program for FSEs in its direct service area starting January 1, 2005.

In May 2006, the State Water Resources Control Board (SWRCB) adopted *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems*, Water Quality Order No. 2006-0003 (Statewide WDR), which required a similar effort statewide. In December 2006, the SARWQCB rescinded its WDR in lieu of the Statewide WDR. OC San submitted its SSMP to the SWRCB in May 2009. OC San completed its most recent audit of the SSMP in May 2021. More specifics on the county-wide FOG program can be

found in Chapter VIII of the SSMP. The following sections detail OC San's FOG control efforts in FY 2021/22.

Program Administration

The commercial FOG Control Program is administered through a combination of permitting, inspection, compliance tracking, report monitoring, and enforcement. The main elements of the FOG Control Program include:

1. Ordinance No. OCSD-25 – Fats, Oils, and Grease Ordinance for Food Service Establishments,
2. FOG Wastewater Discharge Permits to define and communicate permittees' responsibilities regarding FOG discharges,
3. Required Best Management Practices (BMPs) to minimize FOG-bearing wastewater discharges,
4. Installation and/or required maintenance of grease interceptors (GIs) when applicable,
5. Semi-annual monitoring of BMP implementation and GI maintenance,
6. Screening and evaluation of all inspection and monitoring reports to identify violations and/or deficiencies,
7. Inspection of FSE facilities to verify compliance, and
8. Enforcement Response Plan to respond to violations in a consistent and timely manner.

Permitting

OC San conducted an examination of the FOG trouble spots, as well as an inspection of the FSEs in the service area to collect operational information. A scheme was developed to categorize the distinct types of facilities based upon their potential to discharge FOG, the need to enforce the regulatory requirements of the FOG Ordinance, and the potential of each FSE to impact known or potential trouble spots. Using the combination of inspection data and trouble spot information, FSEs were categorized into the following six groups:

- Category 1: FSEs with a GI installed.
- Category 2: FSEs without a GI installed, that are a significant contributor to a FOG trouble spot, and probably need to install a GI due to their FOG impact to the sewer.
- Category 3: FSEs without a GI installed, that are considered a less significant contributor to a FOG trouble spot but may still need to install a GI in the future due to their proximity to a trouble spot.
- Category 4: FSEs without a GI installed, that are not considered a significant contributor of FOG, are not upstream of a trouble spot, and probably will not need a GI installed.
- Category 5: FSEs found to be an insignificant source of FOG that will not be required to have a permit.
- Category 6: Commercial property owners that maintain a GI common to multiple FSEs.

After creating the six categories and examining the FSEs' operations and discharge configurations, different FOG Wastewater Discharge Permit (permit) alternatives were needed to cover the various conditions encountered. The six categories eventually produced three permit variations. Type 1 covers FSEs that have FOG pretreatment, typically considered to be a below-ground GI. Type 2 is issued to FSEs without pretreatment, i.e., Categories 2, 3, and 4. Type 2 permits include a conditional waiver from the FOG pretreatment requirement, as mandated for all FSEs by OC San's FOG Ordinance. The third permit variation, Type 6, was developed for the strip mall or food court owners who have several FSEs plumbed to a common GI. Type 6 permits only require GI maintenance and do not include any BMP requirements.

The individual FSEs connected to the common interceptor at a Type 6 location are still issued a Type 2 permit that requires BMP implementation.

Permits are currently issued for two-year terms. Prior to permit renewal, the FSE is required to complete and submit an updated permit application and pay the permit application fee. Ownership changes also trigger the issuance of a new permit as the permit is non-transferrable. During FY 2021/22 OC San managed thirty-eight (38) FOG permits with five (5) permittees undergoing a change in ownership during the fiscal year.

Self-Monitoring Report

As a condition of the FOG permits, FSEs are required to implement BMPs; maintain their GIs, if applicable; keep records/logs of employee training and yellow grease disposal; and submit periodic self-monitoring reports to inform OC San of their BMP efforts and GI maintenance activities. Submitted reports are evaluated and used to determine compliance.

Inspection

Regular FSE inspections are an integral and essential part of the FOG Program, because they serve as a regulatory reminder to implement the required BMPs, and for FSEs with no GIs to maintain their FOG pretreatment devices. Every inspection presents an opportunity to provide educational outreach to the FSE community by further reinforcing the importance of the kitchen BMPs and strengthening the cooperative effort ultimately needed to effectively control FOG discharges to the sewer. The FOG program includes two distinct types of inspections, 1) a kitchen BMP inspection conducted by the Orange County Health Care Agency (OCHCA), and 2) a compliance inspection conducted by OC San staff. The verification that GIs are periodically pumped out and in compliance with the Twenty-five Percent (25%) rule (total depth of the floating grease layer plus the settleable solids layer shall not exceed 25% of the total liquid depth of the GI) is primarily accomplished through the *Semi-Annual GI Wastehauling Report* submittals.

Compliance

Violation of a permit requirement or provision of the FOG Ordinance, or the failure to submit a required report can lead to issuance of a CAN. The CAN is followed by an NOV which includes the assessment of noncompliance fees if the deficiency is not corrected in a timely manner.

FOG Program Effectiveness

Monitoring the effectiveness of the FOG program enables OC San to refine its program implementation as necessary to comply with its requirement to eliminate preventable SSOs. OC San uses a GIS to analyze the relationship between trouble spots, FSEs, and SSOs. Areas of concern are evaluated and prioritized based on the impact of FSE proximity, tributary residential density, and FOG accumulation in the sewer line, as determined by both CCTV and field crew observations. OC San coordinates with the Operations and Maintenance staff to maintain an effective commercial FOG program by keeping trouble spots under surveillance and following up on grease accumulations before they reach a critical stage. Table 9.2 summarizes the SSO data from the past two reporting periods. This data demonstrates the effectiveness of the FOG program at reducing the frequency of SSO events.

Table 9.2 FOG Program Effectiveness, FY 2021/22 Orange County Sanitation District, Resource Protection Division		
Spills	FY 2020/21	FY 2021/22
OC San system spills attributable to FSE FOG	0	0
OC San system spills attributable to residential FOG	0	0
Private lateral spills attributable to FOG	0	0
Total FOG-related spills	0	0

9.2.2 John Wayne Airport FSEs

John Wayne Airport (JWA), a commercial and general aviation airport owned and operated by the County of Orange, houses approximately eight FSEs that feed into six existing grease interceptors. In April 2022, OC San was contacted by a JWA consultant inquiring about the preferred sizing method of grease interceptors, because JWA was considering additional FSEs. This inquiry precipitated an investigation regarding FOG Program jurisdiction, because FOG Program responsibility is tied to the local sewer service provider, and OC San was unaware which agency's collection system the potential FSEs would connect to for local sewer service.

OC San staff has invested considerable staff resource to locate and review records and agreements that span over three decades; however, jurisdiction remains undetermined at this time. The investigation will continue into the next reporting period.

9.3 Radiator Shops

The Radiator Shop Certification Program aims to prevent heavy metal-bearing liquids, oil and grease, spent antifreeze/coolant, as well as any other hazardous wastes from being discharged to the sewer. The program requires shops that rebuild and repair radiators to biennially certify the following:

- No industrial wastewater or spent antifreeze/coolant is discharged to the sewers,
- Floor drains are permanently sealed and secured from spills or accidental discharges,
- Water recycling systems are close-looped with no connection to the sewer, and
- Wastehauling records are maintained onsite and available for review upon request.

The Radiator Certification Program for FY 2021/22 contained fourteen (14) radiator shops. In the Fall 2021, OC San required these fourteen radiator shops to complete another self-certification statement. OC San conducted verification inspections in Spring 2022 and found four facilities are no longer in business or servicing metallic radiators, leaving ten radiator shops in the program at the end of the reporting period. As part of OC San's ongoing Industrial Waste Survey activities, as new radiator repair shops are identified, they will be evaluated for incorporation into the certification program.

9.4 Dry Cleaners

Initially implemented to prevent soil and groundwater contamination by perchloroethylene (PERC), the Dry Cleaner Certification Program was revitalized as an important outreach tool to help protect the GWRS. The program tracks the solvent usage and facility ownership within the dry cleaner community to prevent the discharge of solvent-containing wastes from dry cleaning operations. Rather than just examining the spent solvent disposal, additional emphasis is placed on the contaminated water from the solvent/water separator, which is typically managed by either wastehauling offsite or by performing onsite evaporation. The program requires dry cleaning establishments to certify annually the following:

1. No waste solvent is discharged to the sewer,
2. Dry cleaning machines and auxiliary equipment are not connected to the sewer,
3. Floor drains are secured from spills and accidental discharges,
4. Solvent waste is wastehauled for offsite disposal in accordance with all applicable laws, and
5. Solvent-contaminated separator water is wastehauled and/or evaporated.

Certification forms are mailed to every dry-cleaning facility at the beginning of the annual cycle. After the completed certifications are returned, audit inspections are conducted to verify the information. Dry cleaning facilities must maintain their wastehauling records onsite and make them available for review during inspection. Although all active facilities and garment collection facilities with equipment onsite receive a certification form, only PERC users are routinely inspected by OC San. At the end of FY 2021/22, there

were a total of two hundred forty-eight (248) dry cleaning facilities in the OC San Dry Cleaner Certification Program, of which 40 were known as of the last oversight inspections to have been using PERC onsite.

During the FY 2020/21 certification cycle, OC San deferred PERC facility inspections because as of January 1, 2021, all PERC dry cleaning systems within the South Coast Air Quality Management District (SCAQMD) were to have been removed from service by physically removing the machine or by disconnecting utilities (electric, steam lines) to the machine and draining all PERC from the machine tanks. However, despite the regulatory deadline, SCAQMD offered dry cleaning facilities an opportunity to request a hardship variance. Several facilities in OC San's service area were granted a variance with the last permissible onsite use extended until June 2021.

In FY 2021/22, once SCAQMD's variance period ended, with anticipation that reasonable potential for PERC discharge from the drycleaners would no longer exist, OC San commenced program closure inspections at the certification program's 40 known PERC dry cleaning facilities. In February and March 2022 OC San conducted closure inspections and found six required follow-up inspections to confirm initial observations. Additionally, one new facility was identified and inspected based on information collected during the oversight inspections. Follow-up inspection findings (June 2022), found one facility continues to have PERC onsite. OC San intends to refer this facility to the SCAQMD enforcement branch for a compliance review based on the PERC ban.

9.5 Dry Weather Urban Runoff Diversions

OC San accepts the diversion of Dry Weather Urban Runoff to the sewer to assist MS4 permittees address various public health and environmental issues which are difficult to control through traditional stormwater BMPs. Urban runoff is water that is generated by daily activities such as lawn irrigation, hosing down sidewalks, and car washing. As the water flows across the urban landscapes and through the storm drain system, the water may become contaminated with nutrients, pesticides, heavy metals, toxic chemicals, bacteria, and viruses. Once the contaminated water reaches our creeks, rivers, and shoreline, the pollutants may harm wildlife and native vegetation, spoil recreational opportunities, and even cause human illness through contact with recreational waters.

Investigation into the bacterial contamination along the Huntington Beach shoreline in 1999 suggested that Dry Weather Urban Runoff flowing into the ocean from the surrounding watersheds may have caused or contributed to the resulting beach closures. Recognizing that Orange County beaches were being affected by pollution carried by urban runoff and willing to assist MS4 permittees during dry weather, the OC San Board of Directors adopted a series of resolutions agreeing to accept a limited, controlled amount of Dry Weather Urban Runoff into the sewer system. Resolution No. 01-07, adopted March 28, 2001, declared that OC San will initially waive fees and charges associated with authorized discharges of Dry Weather Urban Runoff to the sewer system until the total volume of all runoff discharges exceeded four MGD calculated on a monthly average. In June 2002, Assembly Bill 1892 amended OC San's charter to formally allow the diversion and management of Dry Weather Urban Runoff flows. For the first 12 years of the Dry Weather Urban Runoff Diversion Program, the average monthly flow averages remained below the four MGD threshold, thus avoiding user fees for treatment and disposal costs being assessed to the diversion permittees. In 2012, OC San received several diversion proposals to deal with bacteria, nitrogen, and selenium loading to the Upper Newport Bay. The average daily discharge volume from the additional proposed diversions combined with the existing diversion flows would eventually exceed the four MGD fee threshold.

On June 12, 2013, the Board of Directors adopted Urban Runoff Resolution No. 13-09 to expand the waiver of fees or charges on the treatment of Dry Weather Urban Runoff from four MGD to 10 MGD with "dry weather" defined as periods when no measurable rainfall occurs in any portion of OC San's service area and exclusive of the cessation period following the rainfall during periods when OC San's collection, treatment, and disposal facilities would be impacted by the flows. This policy change provided a vehicle for additional Dry Weather Urban Runoff discharge to the sanitary sewer which might assist the MS4 permittees addressing environmental problems caused by Dry Weather Urban Runoff, such as contaminant loading in the Upper Newport Bay Watershed. The latest resolution's adoption once again demonstrated OC San's commitment to protecting public health and the environment. Under Resolution 13-09, the MS4

permittees are authorized to divert a maximum of 10 MGD for all permitted Dry Weather Urban Runoff combined.

The County of Orange is the principal permittee that coordinates the OCFCD and the regulated cities' efforts in implementing the Water Quality Management Plan required by the NPDES Permit for discharge of urban stormwater. Before a diversion is implemented, the proposed project is presented to the Orange County Stormwater Program Technical Advisory Committee (TAC). The committee evaluates the proposal, and if approved by the TAC, the TAC puts the diversion on its Dry Weather Diversion Priority List. This approval step ensures that OC San's Dry Weather Urban Runoff Diversion Program's limited capacity is effectively utilized to improve coastal water quality.

Once the TAC accepts a new diversion proposal, OC San initiates with the responsible entity an *Agreement for Dry Weather Urban Runoff Discharge* to govern sanitary sewer service to the diversion project. In some cases, the entity is a partnership of several responsible municipalities, special districts, and the County of Orange. The agreement cites the reasons that the discharge is being accepted and details the responsibilities of the entity, or agency, that will be maintaining and operating the diversion. The agreement stipulates that the quality and quantity of the Dry Weather Urban Runoff from the Drainage Area(s) represented in the agreement shall meet all terms, conditions, and discharge limits contained in OC San's Ordinance and board resolutions.

In addition to the adoption of an Agreement, discharge for treatment and disposal from each diversion structure is only permissible under the terms and conditions of a Dry Weather Urban Runoff discharge permit administered by the Resource Protection Division and the Dry Weather Urban Runoff Diversion Program. The permit establishes discharge limits, constituent monitoring, and flow metering installation and calibration requirements, water quality and quantity reporting requirements, and a specific prohibition for storm runoff (as discharge is only authorized during periods of dry weather).

9.5.1 Dry Weather Diversion Systems and Urban Runoff Flow

Currently, twenty (20) active Dry Weather Urban Runoff diversion structures are permitted, three (3) owned and operated by the County of Orange, eleven (11) owned and operated by the City of Huntington Beach, two (2) owned and operated by the City of Newport Beach, three (3) owned and operated by the Irvine Ranch Water District, and one (1) owned and operated by PH Finance, who is the present owner of the Pelican Hill Resort. In FY 2021/22 one facility owned and operated by the City of Newport Beach was deactivated and no longer discharges to OC San.

In September 2021 an Agreement was reached between OC San and City of Newport Beach (CNB) for two additional drainage basins. This new Agreement facilitates management and permitting for two additional diversions. As of June 2022, complete and responsive permit applications remain outstanding. OC San is working with CNB to support CNB's permit application preparation. In FY 2021/22, Agreement negotiations between OC San and the Santa Ana-Delhi Partners Funding Partners continue into FY 2022/23 for an additional drainage basin which would facilitate management and permitting for one additional diversion.

Table 9.3 shows the range of monthly diversion discharges and the total discharge over the past six years.

Table 9.3 Dry Weather Urban Runoff Discharges, FY 2015/16 – 2021/22 Orange County Sanitation District, Resource Protection Division		
FY	Million Gallons Discharged	Monthly Average Flow Range (MGD)
2015/16	262	0.32 – 1.21
2016/17	369	0.18 – 1.58
2017/18	461	0.29 – 1.90
2018/19	337	0.28 – 1.56
2019/20	480	0.44 – 2.06
2020/21	565	1.38 – 3.07

2021/22	383	1.17 – 2.02
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The diversions cumulatively discharged 383 million gallons (MG) of Dry Weather Urban Runoff, with a normalized discharge of 1.5 MGD, and a monthly flow range between 1.17 and 2.02 MGD. . The flow volume trended downward by 182 MG from the previous year, reflecting the observed year-over-year decrease in flows across nearly three fourths of the diversions.

Flows for the 11 City of Huntington Beach diversions decreased 64 MG from FY 2020/21 totals (257 MG in FY 2021/22 compared to 321 MG in FY 2020/21). Total cumulative flow discharge for the three active Orange County Public Works (OCPW) diversions, Huntington Beach, Greenville Channel, and Santa Ana River, decreased 14 MG (35 MG in FY 2021/22 compared to 49 MG in FY 2020/21) from the previous year as the Greenville Channel diversion remained offline most of the year due to facility startup issues following a long idle period during repair. The flow from the three IRWD diversions, Muddy Canyon, Los Trancos Canyon, and Peters Canyon, decreased 102 MG overall (78 MG in FY 2021/22 compared to 180 MG in FY 2020/21) primarily due to a nearly 80% decrease in discharge from the Peter’s Canyon diversion. The flow from the City of Newport Beach diversions decreased 1.5 MG over the previous year, as the Big Canyon diversion ceased discharge in November 2021, the Mid-Big Canyon diversion collected and discharged the combined flow from the drainage basin, and Newport Beach experienced mechanical problems fully deactivating its diversions during wet weather. The Pelican Point Diversion flow rate continues to remain consistent with previous report period totals.

Only three (3) of the twenty (20) diversions flow to Plant No. 1: the Santa Ana River Diversion, the Peters Canyon Diversion, and a portion of the Scenario Diversion. Due to the multiple paths that the Scenario flows can take to reach OC San’s Plant No. 1 or Plant No. 2 simultaneously, it is not possible to accurately determine how much water from this diversion is available for the GWRS. The remaining eighteen (18) diversions are located closer to the coast, flow to Plant No. 2, and are not currently available for reclamation. The Santa Ana River and Peters Canyon Diversions discharged a total of 120 MG to Plant No. 1 in FY 2021/22. These two diversions account for 8.1% of the total Dry Weather Urban Runoff diverted to the OC San’s collection system in FY 2021/22 and contributed nearly 3 MG per month to GWRS.

If current discharge trends continue, OC San expects to receive between 350 MG and 750 MG next fiscal year from the existing diversions. During the past 23 years, OC San treated over 11 billion gallons of Dry Weather Urban Runoff that would have otherwise flowed into the ocean without treatment. Since OC San’s Dry Weather Urban Runoff Program began, total treatment and disposal cost associated with these flows has reached approximately \$13.5 million, based upon applicable industrial user fee rates over this period. Because the monthly average flow range remains under 10 MGD, OC San currently waives all fees and charges associated with authorized discharges of Dry Weather Urban Runoff.

Table 9.4 details the current diversion locations, trunkline/tributary destinations, and the average discharge volume of each individual location for this reporting period.

Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2021/22 Orange County Sanitation District, Resource Protection Division					
No.	Diversion	Location	Trunkline	Tributary	Average Discharge* (MGD) ¹
<i>Owned and Managed by the City of Huntington Beach</i>					
1	Atlanta Diversion	8151 Atlanta Avenue	Coast (via Atlanta Interceptor)	Plant No. 2	0.296
2	Newland Diversion	8612 Hamilton Street	Coast (via Atlanta Interceptor)	Plant No. 2	0.286
3	Banning Diversion	2201 Malibu Lane	Miller-Holder	Plant No. 2	0.121
4	Hamilton Diversion	10101 Hamilton Avenue	Miller-Holder	Plant No. 2	0.09

Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2021/22
Orange County Sanitation District, Resource Protection Division

No.	Diversion	Location	Trunkline	Tributary	Average Discharge* (MGD) ¹
5	Adams Diversion	19661 Chesapeake Lane	Miller-Holder	Plant No. 2	0.053
6	Indianapolis Diversion	9221 Indianapolis	Miller-Holder	Plant No. 2	0.052
7	Scenario Diversion	4742 Scenario Drive	Knott	Plant No.1 & No. 2 [^]	0.026
8	1 st Street CDS	103 Pacific Coast Hwy	Coast	Plant No. 2	0.024
9	Meredith Diversion	20192 Mainland Lane	Miller-Holder	Plant No. 2	0.022
10	Flounder Diversion	9731 Flounder Drive	Bushard	Plant No. 2	0.008
11	Yorktown Diversion	9211 Yorktown Avenue	Miller-Holder	Plant No. 2	0.008
Owned and Managed by the County of Orange					
12	Greenville-Banning Channel	2501 Placentia Avenue	Interplant	Plant No. 2	0.015
13	Huntington Beach Channel	8092 Adams Avenue	Coast (via Delaware)	Plant No. 2	0.082
14	Santa Ana River	10844 Ellis Avenue	Sunflower	Plant No. 1	0.021
Owned and Managed by Irvine Ranch Water District					
15	Los Trancos Diversion	Pacific Coast Highway (Crystal Cove State Park)	South Coast	Plant No. 2	0.159
16	Muddy Canyon Diversion	Pacific Coast Highway (El Moro State Park)	South Coast	Plant No. 2	0.045
17	Peters Canyon Diversion	3001 Main Street	Main Street	Plant No. 1	0.095
Owned and Managed by the City of Newport Beach					
18	Newport Dunes Diversion (Gravity Flow)	1131 Back Bay Drive	South Coast (via Back Bay)	Plant No. 2	0.002
19	Mid Big Canyon	1951 Jamboree Road	South Coast (via Back Bay)	Plant No. 2	0.040
20	Big Canyon	15 Rue Verte Lane	South Coast (via Back Bay)	Plant No. 2	0.015
Owned and Managed by PH Finance, LLC					
21	Pelican Point Diversion	36 Pelican Point Drive	South Coast	Plant No. 2	0.007
Sum of the Average Daily Discharges (FY 2021/22)					1.50

*Individual daily averages calculated using the formula: cumulative flow total for the year / number of discharge days. Note that number of discharge days = number of days in the discharge period – number of days the DWUR Program suspended due to wet weather.

¹MGD = million gallons per day

[^]Scenario flows to Plant No. 1 and Plant No. 2 simultaneously due to Bushard-Ellis junction box.

A. Newport Dunes: System offline Feb – Mar 2022

B. Mid-Big Canyon: System offline Mar 2022

Table 9.4 Average Dry Weather Urban Runoff Discharge Volumes by Diversion, FY 2021/22 Orange County Sanitation District, Resource Protection Division					
No.	Diversion	Location	Trunkline	Tributary	Average Discharge* (MGD) ¹
C. Big Canyon: System offline since Nov 2021					

Table 9.5 summarizes several significant Dry Weather Urban Runoff Program statistics.

Table 9.5 Dry Weather Urban Runoff Diversion Program, FY 2021/22 Orange County Sanitation District, Resource Protection Division	
Number of new permits generated	0
Number of permitted diversions	21
Total average daily discharge	1.5
Monthly average daily discharge range	1.17-2.02
Newly proposed diversions	3
Estimated combined discharge for proposed/pending diversions	2.1
Maximum combined Dry Weather Urban Runoff discharge allowance	10 MGD
*Resolution No. 13-09 accommodates 10 MGD of Dry Weather Urban Runoff without cost to permittees.	

9.5.2 Proposed Dry Weather Urban Runoff Diversion Systems

The City of Newport Beach's Arches Diversion project consists of two diversions near the intersection of Newport Boulevard and Pacific Coast Highway. The project has already been vetted with the Orange County Stormwater Program TAC. Prior to this reporting period, OC San's Engineering Planning Division worked with the City of Newport Beach on the diversion facility design specifications. In parallel and continuing through this FY 2021/22, OC San's Resource Protection Division worked to complete a sewer service agreement which was finalized on September 1, 2021. Prior to discharge, a discharge permit must be issued. OC San anticipates City of Newport Beach will complete the permit application process and commence discharge next fiscal year. The Arches Diversions are projected to discharge up to 0.1 MGD to OC San's Plant No. 2.

Despite long delays, construction on the Santa Ana-Delhi Channel Diversion in the City of Santa Ana neared completion this past fiscal year. As the fiscal year closed, OC San was working with the County of Orange and the City of Santa Ana to facilitate acceptance testing discharge from the diversion to confirm that the diversion has been constructed appropriately. OC San also worked during the fiscal year to support the County of Orange and ensure that the facility would be constructed in accordance with OC San requirements, including ensuring the facility has both a representative sample point and an *in-situ* hydraulically-calibrated effluent flow meter. In parallel, OC San staff continued to work with the County of Orange on behalf of the Funding Partners to finalize a sewer service agreement which is required before the Santa Ana-Delhi Channel Dry Weather Urban Runoff Diversion may discharge to OC San; discharge has not yet commenced from the Santa Ana-Delhi Channel Diversion. The Santa Ana-Delhi Channel Diversion is projected to discharge up to 1.94 MGD to OC San's Plant No. 1.

In FY 2019/20 OC San learned during meetings to address the Newport Bay TMDL issues that at least two new flood control channel diversions were being proposed: the Santa Isabel and East Costa Mesa Channel diversions. To date, OC San has not been approached to incorporate these diversions into an existing agreement or to develop and execute an additional agreement for the drainage basins these channels serve. In March 2022, City of Huntington Beach inquired about converting their existing Heil Stormwater Pump Station into a Dry Weather Urban Runoff Diversion facility. OC San has not yet been made aware that the TAC has prioritized the Heil facility for use as a Dry Weather Urban Runoff Diversion.

In addition, continuing this past fiscal year, modifications to the Newport Dunes diversion remained under consideration; City of Newport Beach provided OC San a rehabilitation proposal, which was not yet accepted as the fiscal year ended.

9.5.3 Dry Weather Urban Runoff Quality

OC San requires self-monitoring of the Dry Weather Urban Runoff discharges and conducts semi-annual sampling and analysis to ensure discharge limit compliance for various regulated constituents. Overall, the monitoring of the Dry Weather Urban Runoff discharges shows very consistent compliance with OC San's local limits. Trichloroethene at 0.0156 mg/L was detected at the City of Newport Beach's Mid-Big Canyon diversion. Although OC San no longer has a local limit for TTOs since the adoption of Ordinance No. OCSD-48 in 2016, the Resource Protection Division continues to monitor for TTOs as a safety measure to screen for pollutants of concern.

Monitoring results for metal constituents were all within local discharge limits.

Table 9.6 summarizes the minimum and maximum concentrations detected in the Dry Weather Urban Runoff during the reporting period. OC San's latest instantaneous discharge limits are included for comparison.

Table 9.6 Dry Weather Urban Runoff Compliance, FY 2021/22 Orange County Sanitation District, Resource Protection Division			
Constituent	Minimum Concentration Reported (mg/L)	Maximum Concentration Reported (mg/L)	Instantaneous Discharge Limit (mg/L)
Ammonia N	ND (< 0.1)	4.61	None
BOD	ND (< 2.225)	17.1	None
TSS	ND (< 0.6)	477	None
Cadmium	ND (< 0.0002)	0.0390	1.0
Chromium	ND (< 0.0002)	1.58	20.0
Copper	ND (< 0.0005)	0.405	3.0
Lead	ND (< 0.0002)	0.025	2.0
Molybdenum	ND (< 0.0001)	0.257	2.3
Nickel	ND (< 0.001)	0.135	10.0
Selenium	ND (< 0.0004)	0.0549	3.9
Zinc	ND (< 0.005)	0.306	10.0
Oil & Grease Min.	ND (< 0.96)	4.00	100.0
Sulfide (Dissolved)	ND (< 0.05)	ND (< 0.1)	0.5
Sulfide (Total)	ND (< 0.05)	ND (<0.05)	5.0
Pesticides	ND (<0.000010)	0.000012	0.01
*ND = not detectable (below analytical detection or reporting limits) mg/L = milligrams per liter			

OC San's Dry Weather Urban Runoff Diversion Program continues its success in helping to maintain the quality of the receiving waters along the Orange County coastline. For a sixth year in a row, Orange County's beaches have received very favorable ratings from Heal the Bay's annual report³. Summer Dry Grades were excellent and just above the five-year average with 99% of beaches receiving A or B grades. Wet weather grades were also better than average with 66% of the beaches receiving A and B grades. Winter Dry Grades were stellar with 95% of the beaches receiving A and B grades. A total of nineteen (19) beaches made it on the honor roll, which is more than any other county. Orange County received seven (7)

³ Heal the Bay. 2022. 2021-2022 Beach Report Card. Accessed from: <https://healthebay.org/beachreportcard2022/>

inches of rain, which is lower than the historical average of nine (9) inches. The decrease in rainfall did not appear to impact Wet Weather Grades³.

OC San's Dry Weather Urban Runoff Diversion Program provides an important economic benefit to the Orange County economy by maintaining the coastline's reputation as a desirable tourist destination. By helping to keep our beaches open, the program continues to provide a significant benefit to the beach-going public.

The role of the Dry Weather Urban Runoff Diversion Program expanded with the addition of diversions issued to the Big Canyon permit on February 1, 2015; Peters Canyon on July 1, 2016; and Mid Big Canyon on August 9, 2017. Constructed to reduce selenium-laden waters reaching the Upper Newport Bay, these diversions enhance the estuarine environment for the threatened and endangered species that inhabit the area. Based upon the County of Orange's estimate, diversion of the various Peters Canyon Wash and Big Canyon tributaries would decrease the amount of selenium reaching the bay by 150 to 250 pounds annually. Based upon the flow and monitoring data received for these three diversions, as much as twelve (12) pounds of selenium were diverted from the bay during the FY 2021/22 reporting period.

This rerouting of Dry Weather Urban Runoff from stormwater pump stations, flood control channels, and natural conveyances before it reaches receiving waters, allows OC San to assist with regional public health and water quality protection alongside its primary function of maintaining high quality collection, treatment, and disposal of wastewater. In this manner, the program assists in providing vital protection to the Areas of Special Biological Significance along Orange County's coastline.

9.5.4 Dry Weather Urban Runoff Diversion Locations

The diversion systems are located in four different watersheds in Orange County: Anaheim Bay – Huntington Harbor, Lower Santa Ana River, Newport Bay, and Newport Coastal. These watersheds encompass a variety of designated land uses, such as residential, commercial, industrial, and agriculture.

9.5.5 Dry Weather Urban Runoff Diversion Enforcement Actions

City of Newport Beach

After meetings and onsite visits in October 2020, in December 2020 OC San issued a letter to City of Newport Beach (City) containing requirements to complete *in-situ* hydraulic calibration requirements for its effluent meters at its Big Canyon and Mid-Big Canyon DWURD facilities. In addition, the City was required to develop and report an Operations and Maintenance (O & M) Plan to ensure continuous meter operation of its effluent meter equipment and submit past due required Monthly Meter Reading Reports (MMRRs). Despite providing the City time to research and propose a compliance plan, the City failed to complete the compliance requirements in a timely manner. In addition, as of March 2021 as the City's three DWURD facilities' discharge permits were to expire, the City had not applied for permit renewal. In April 2021, to provide the City additional time to achieve compliance with outstanding effluent meter calibration, O & M plan development, and permit renewal application submittals, OC San extended the duration of the existing discharge permits and incorporated compliance requirements into the amended permits with a new expiration date of June 30, 2021.

This past fiscal year, despite support from OC San in the form of a permit application guidance document shared with the City on December 2, 2021, the City remains non-compliant with compliance requirements in December 2020 letter and has not yet submitted complete and responsive permit renewal applications to OC San. Notably, after evaluation, the City discontinued discharge from one of its three DWURDs and continues to operate its two remaining DWURD under administratively extended permits.

Following receipt on February 15, 2022 of an apparently updated November 2021 Monthly Meter Reading Report (MMRR) for the City's Mid-Big Canyon DWUR, on March 2, 2022, OC San issued a request for clarification regarding conflicts between the originally submitted report (December 14, 2021) and the updated version. On March 17, 2022 the City provided information which clarified that inconsistent meter readings had been provided, corrected effluent flow readings, and findings that the facility's shut of valve failed to close completely during periods of deactivation. On April 25, 2022 the City reported results of its investigation into the failed shut-off valve and a proposal to implement corrective action. As of the end of

the reporting period, the City had not yet reported completion of the corrective action, OC San will pursue completion of the corrective action during the next reporting period.

City of Huntington Beach

In August 2021, OC San received Monthly Meter Reading Reports (MMRRs) from the City of Huntington Beach (City) which contained certification statements signed by an individual who was not authorized as a signatory for the City's DWURD permits. Following informal conversations with City staff, on September 20, 2022 the City resubmitted previously improperly certified MMRRs and on October 25, 2021 the City submitted new signatory forms designating two new individuals to serve on behalf of the City.

9.6 Dental Amalgam Source Control Program

On June 14, 2017, the US EPA published technology-based pretreatment standards under the Clean Water Act to reduce discharges of mercury from dental offices into Publicly Owned Treatment Works. The new Dental Office Point Source category requires dental offices to utilize amalgam separators and implement two BMPs. The Dental Office Point Source category became effective on July 14, 2017.

New dental facilities opened on or after July 14, 2017, designated Pretreatment Standards New Sources (PSNS), must immediately comply with pretreatment standards, including the installation of amalgam separators. A one-time compliance report must be submitted to OC San no later than 90 days following the introduction of wastewater to OC San. Although PSNS does not include the purchase of an existing dental facility, those facilities changing ownership must also submit their report no later than 90 days following the transfer. Existing facilities designated as Pretreatment Standards Existing Sources that started before July 14, 2017 without amalgam separators on June 14, 2017, must install amalgam separators by July 14, 2020, and submit their one-time compliance reports by October 12, 2020. Existing dental facilities with amalgam separators on June 14, 2017, must replace those separators by June 14, 2027, or whenever the amalgam separator needs to be replaced, whichever is earlier.

To conform to this federal pretreatment program requirement, OC San implemented a Dental Amalgam Source Control Program to enable the dental offices to comply with this new regulation. OC San developed and posted Dental Office Point Source category information on the OC San website (www.ocsan.gov) complete with links to the US EPA's development document, effluent guidelines, fact sheet, and the applicable dental category regulation. This information was present on the website as of August 2017. Two compliance report forms were developed for the dental facilities: a comprehensive form for facilities that place or remove amalgam, and a second exempt/limited form for facilities that only remove amalgam on a limited or emergency basis. The forms were first made available in September 2017, and a new form, combining the exempt and non-exempt forms was made available in May 2022.

As required by the regulation, OC San implemented procedures for receiving, reviewing, and retaining dental office compliance reports. OC San has conducted multiple mass mailings to dental offices in OC San's service area since January 2018. As of the end of this reporting period OC San has received and processed 1,642 reports. OC San is currently assisting nonresponding and new dental offices with their report submittal and by follow up emails, phone calls and on-site visits. These activities are ongoing.

Next fiscal year, OC San intends to explore using automation to support the Dental Amalgam Program.

9.7 Public Education and Outreach

In addition to the public education and outreach conducted by OC San's Public Affairs Office, Resource Protection Division staff routinely work with OC San's Member Agencies; attend interagency and professional organization meetings, conferences, and workshops; serve on committees, and make presentations. Working with other agencies and professional organizations benefits OC San by helping OC San keep abreast of potential future regulations and trends which may be beneficial or have impacts that OC San must prepare for, as well as providing information to the public about OC San's programs.

Appendix A. Monitoring and Compliance Status Report

APPENDIX A
LIST OF SIGNIFICANT INDUSTRIAL USERS WITH MONITORING COMPLIANCE STATUS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
3M ESPE Dental Products	Z-371301	2111 Mcgaw Ave, Irvine, CA 92614	339114	433.17(a), 467.16, 471.65(n), 471.65(q)	1	0	0			
9W Halo Western opCo, L.P.	1-600378	1575 N.Case St, Orange, CA 92867	812332	403.5(d)	2	10	2			Class 1 Permit Deactivated
A & G Electropolish	1-531422	18330 Ward St, Fountain Valley, CA 92708	332813	433.17(a)	5	20	8			
A & K Deburring and Tumbling, Inc.	1-511362	2008 S.Yale St, H Unit, Santa Ana, CA 92704	332812	403.5(d)	4	23	4			
A & R Powder Coating, Inc.	1-021088	1198 N.Grove St, B Unit, Anaheim, CA 92806	332812	433.17(a)	6	19	8			
Access Business Group, LLC	1-531435	5600 Beach Blvd, Buena Park, CA 90621	325412	439.47	4	42	19			
Accurate Circuit Engineering	1-011138	3019 Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	30	8			
Active Plating, Inc.	1-011115	1411 E.Pomona St, Santa Ana, CA 92705	332813	433.17(a)	4	30	61			
ADS Gold, Inc.	Z-321851	3843 E.Eagle Dr, Anaheim, CA 92807	331410	433.17(a)	1	0	0			
Advance-Tech Plating, Inc.	1-021389	1061 N.Grove St, Anaheim, CA 92806	332813	433.17(a)	12	37	58	Chromium, Zinc		
Air Industries Company, A PCC Company (Chapman)	1-031013	7100 Chapman Ave, Garden Grove, CA 92841	332722	403.5(d)	6	14	8			

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Air Industries Company, A PCC Company (Knott)	1-531404	12570 Knott St, Garden Grove, CA 92841	332722	433.17(a), 471.65(e), 471.65(m), 471.65(n), 471.65(r), 471.65(s), 471.65(u), 471.65(w)	4	44	64	Chromium, Fluoride		
Alex C. Fergusson, LLC, A Zep Company	1-601167	8371 Monroe Ave, Stanton, CA 90680	325611	417.166, 417.176, 417.36	3	13	0			Class 1 Permit Deactivated
Alexander Oil Company	1-581185	19065 Stewart St, Huntington Beach, CA 92648	211111	403.5(d)	4	0	0			
All Metals Processing of O.C., Inc.	1-031110	8401 Standustrial St, Stanton, CA 90680	332813	433.17(a)	4	39	20			
Alliance Medical Products, Inc.	1-541182	9342 Jeronimo Rd, Irvine, CA 92618	325412	439.47	4	54	10		Published as SNC for reporting violation(s)	
Allied Electronics Services, Inc.	1-011073	1342 E.Borchard, Santa Ana, CA 92705	334412	433.17(a)	4	26	8			
Allied International	1-031107	6700 Caballero Blvd, Buena Park, CA 90620	325612	417.166, 417.176, 417.66, 417.86	5	32	3		Published as SNC for reporting violation(s)	
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	6550 Caballero Blvd, Buena Park, CA 90620	331523	464.16(a), 464.16(c), 464.16(h), 464.46(a), 464.46(b), 464.46(d)	4	19	26	Zinc		
Alloy Tech Electropolishing, Inc.	1-011036	2220 S.Huron Dr, Santa Ana, CA 92704	332812	433.17(a)	5	26	11	Molybdenum		
Alsco, Inc.	1-021656	1755 S.Anahaim Blvd, Anaheim, CA 92802	812331	403.5(d)	4	25	16			

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ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Aluminum Forge - Div. of Alum. Precision	1-071035	502 E. Alton Ave, Santa Ana, CA 92707	332112	467.46	4	30	22			
Aluminum Precision Products, Inc. (Central)	1-011038	3132 W. Central Ave, Santa Ana, CA 92704	332112	467.45	4	22	10			
Aluminum Precision Products, Inc. (Susan)	1-011100	2621 S. Susan St, Santa Ana, CA 92704	332112	467.45, 467.46	4	22	16			
Aluminum Precision Products, Inc. (Warner)	1-511387	3323 W. Warner Ave, Santa Ana, CA 92704	332112	467.46	4	16	10			
Amerimax Building Products, Inc.	1-021102	1411 N. Daly St, Anaheim, CA 92806	332812	465.35	7	33	8	CN	Published as SNC for discharge and reporting violation(s)	
Ameripecc, Inc.	1-031057	6965 Aragon Cir, Buena Park, CA 90620	312111	403.5(d)	4	19	0			
Anaheim Extrusion Co., Inc.	1-021168	1330 & 1340 N. Kraemer Blvd, Anaheim, CA 92806	331318	467.35(c)	9	25	10			
Anchen Pharmaceuticals, Inc. (Fairbanks)	1-541180	72 Fairbanks, Irvine, CA 92618	325412	439.47	2	24	15			Class 1 Permit Deactivated
Anchen Pharmaceuticals, Inc. (Jeronimo)	1-541179	9601 Jeronimo Rd, Irvine, CA 92618	325412	439.47	2	26	15			Class 1 Permit Deactivated
Andres Technical Plating	1-521798	1055 Ortega Way, C Unit, Placentia, CA 92870	332813	433.17(a)	7	23	18	Chromium, Nickel	Published as SNC for reporting violation(s)	
AnoChem Coatings	1-600295	1102 East Washington Ave, Santa Ana, CA 92701	332813	433.17(a)	4	26	13	Nickel		

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Anodyne, Inc.	1-511389	2230 S.Susan St, Santa Ana, CA 92704	332813	433.17(a)	4	22	30			
Anomil Ent. Dba Danco Metal Surfacing	1-011155	401 W.Rowland St, Santa Ana, CA 92707	332813	433.17(a)	5	32	20	Copper		
APCT Anaheim	1-600689	250 E.Emerson Ave, Orange, CA 92865	334112	433.17(a)	4	30	20			
APCT Orange County	1-600503	1900 Petra Ln, C Unit, Placentia, CA 92870	334412	433.17(a)	5	33	61	Nickel		
ARO Service	1-021192	1186 N.Grove St, Anaheim, CA 92806	336411	433.17(a)	6	19	8	Copper, pH, Zinc		
Arrowhead Operating Inc.	1-601062	219 First St, Huntington Beach, CA 92648	211111	403.5(d)	4	22	4			
Arrowhead Products Corporation	1-031137	4411 Katella Ave, Los Alamitos, CA 90720	336413	420.76, 420.96(c)(5), 471.35(a), 471.35(bb), 471.35(dd), 471.35(ff), 471.35(j), 471.35(l), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.65(a), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(s), 471.65(w), 471.65(x)	7	43	36	CN, Fluoride		

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Astech Engineered Products (1)	1-571295	3030 Red Hill Ave, Santa Ana, CA 92705	336412	433.17(a)	4	34	8	Chromium, Copper, Lead, Molybdenum, Nickel, pH, Silver, Zinc		Class 1 Permit Deactivated, Formerly listed as Astech Engineered Products, Inc. (Bldg. 1 & 2)
Astech Engineered Products (2)	1-601719	3030 Red Hill Ave, Santa Ana, CA 92705	336412	433.17(a)	0	0	0			New Class 1 Permit Issued
Astech Engineered Products, Inc. (Bldg. 2 Outside)	Z-371320	3030 Red Hill Ave, Santa Ana, CA 92705	336412	471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q)	1	0	0			
Auto-Chlor System of Washington, Inc.	1-511384	530 Goetz Ave, Santa Ana, CA 92707	325611	417.166	5	25	11	Copper		
Aviation Equipment Processing	1-071037	1571 MacArthur Blvd, Costa Mesa, CA 92626	336413	433.17(a)	6	19	7	Cadmium		
Avid Bioservices, Inc.	1-571332	14191 Myford Rd, Tustin, CA 92780	325414	439.17, 439.27	7	84	82	Acetone	Published as SNC for reporting violation(s)	
B&B Enameling, Inc.	Z-331432	17591 Sampson Ln, Huntington Beach, CA 92647	332812	433.17(a)	0	0	0			
B. Braun Medical, Inc. (East/Main)	1-071054	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.26, 463.36	5	49	10			
B. Braun Medical, Inc. (North/Alton)	1-600382	2206 Alton Pkwy, Irvine, CA 92614	325412	439.47	5	45	10			
B. Braun Medical, Inc. (West/Lake)	1-541183	2525 Mcgaw Ave, Irvine, CA 92614	325412	439.47, 463.16, 463.26, 463.36	5	56	10	pH		
B/E Aerospace	Z-600654	3355 E.La Palma Ave, Anaheim, CA 92806	336413	433.17(a)	1	0	0			

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Basic Electronics, Inc.	1-031094	11371 Monarch St, Garden Grove, CA 92841	334412	433.17(a)	8	22	8			
BAZZ HOUSTON CO .	1-031010	12700 Western Ave, Garden Grove, CA 92841	33211	403.5(d)	4	32	13			
Beckman Coulter, Inc.	1-521824	200 S.Kraemer Blvd, Brea, CA 92821	334516	433.17(a)	4	20	8			
Beo-Mag Plating	1-511370	3313 W.Harvard St, Santa Ana, CA 92704	332813	433.17(a)	4	19	30	CN		
Beverage Visions LLC (Anaheim)	1-601448	4940 E.Landon Dr, Anaheim, CA 92807	311421	403.5(d)	5	20	7	pH		New Class 1 Permit Issued
Beverage Visions LLC (Yorba Linda)	1-601449	24855 Corbit Pl, Yorba Linda, CA 92887	31193	403.5(d)	14	61	12	pH		New Class 1 Permit Issued
Bimbo Bakeries U.S.A, Inc.	1-521838	500 S.Placentia Ave, Placentia, CA 92870	311812	403.5(d)	5	21	4			
Bioduro LLC (Fairbanks)	1-601616	72 Fairbanks, Irvine, CA 92618	325412	439.47	1	14	10			New Class 1 Permit Issued
Bioduro LLC (Jeronimo)	1-601617	9601 Jeronimo Rd, Irvine, CA 92618	325412	439.47	1	14	10			New Class 1 Permit Issued
Black Oxide Industries, Inc.	1-021213	1735 N.Orangethorpe Park, Anaheim, CA 92801	332812	433.17(a)	4	26	8			
Blue Lake Energy	1-521785	5721 Casson Dr, Yorba Linda, CA 92886	211111	403.5(d)	4	17	4			
Blue Ribbon Container and Display, Inc.	1-601468	5450 Dodds Ave, Buena Park, CA 90621	322211	403.5(d)	3	12	3		Published as SNC for reporting violation(s)	New Class 1 Permit Issued

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Bodycote Thermal Processing	1-031120	7474 Garden Grove Blvd, Westminster, CA 92683	332811	403.5(d)	5	9	3			
Boeing Company (Graham)	1-111018	15400 Graham St, Huntington Beach, CA 92649	33641	433.17(a)	4	26	8			
Brasstech, Inc	1-600316	1301 E. Wilshire Ave, Santa Ana, CA 92705	332813	433.17(a)	7	24	22	Molybdenum, Selenium, Zinc		
Brea Power II, LLC	1-521837	1935 Valencia Ave, Brea, CA 92823	221112	403.5(d)	5	23	4			
Bridge Energy, LLC	1-600398	2744 Valencia Ave, Brea, CA 92821	211111	403.5(d)	4	17	11			
Bridgemark Corporation	1-521844	2930 E. Frontera St, A Unit, Anaheim, CA 92806	211111	403.5(d)	1	2	1			Class 1 Permit Deactivated
Brindle/Thomas - Bradley	1-531428	221 1st St, Huntington Beach, CA 92648	211111	403.5(d)	4	29	8			
Brindle/Thomas - Brooks & Kohlbush	1-531429	18462 Edwards St, Huntington Beach, CA 92648	211111	403.5(d)	4	29	8			
Brindle/Thomas - Catalina & Copeland	1-531430	18851 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	4	29	8			
Brindle/Thomas - Dabney & Patton	1-531427	19192 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	4	29	8			

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Bristol Industries	1-021226	630 E.Lambert Rd, Brea, CA 92821	332722	433.17(a), 467.36(c), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(i), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v)	4	45	122			
Brothers International Desserts (North)	1-600583	1682 Kettering St, Irvine, CA 92614	311520	405.86	5	21	4			
Brothers International Desserts (West)	1-600582	1682 Kettering St, Irvine, CA 92614	311520	405.86	7	21	4	pH		
Burlington Engineering, Inc.	1-521770	220 W.Grove Ave, Orange, CA 92865	332811	433.17(a)	3	10	4			Class 1 Permit Deactivated
Cadillac Plating, Inc.	1-021062	1147 W.Struck Ave, Orange, CA 92867	332813	433.17(a)	7	40	62			
Cal-Aurum Industries, Inc.	1-111089	15632 Container Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	30	20			
California Faucets	Z-331431	5271 Argosy Ave, Huntington Beach, CA 92649	332812	433.17(a)	0	0	0			
California Gasket and Rubber Corporation	1-521832	533 W.Collins Ave, Orange, CA 92867	339991	428.66(a)	5	12	4			
CalNRG Operating, LLC	1-601486	2930 E.Frontera St. Unit A St, Anaheim, CA 92806	211111	403.5(d)	3	14	5			New Class 1 Permit Issued
Cargill, Inc.	1-031060	600 N.Gilbert St, Fullerton, CA 92833	311225	403.5(d)	4	24	24			

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Catalina Cylinders, A Div. of APP	1-031021	7300 Anaconda Ave, Garden Grove, CA 92841	331318	467.46	5	35	10	Chromium		
CD Video, Inc.	1-511076	12650 Westminster Ave, Garden Grove, CA 92843	334613	433.17(a)	3	22	17	Nickel		
Central Powder Coating	1-021189	593 Explorer St, Brea, CA 92821	332812	433.17(a)	4	14	8			Class 1 Permit Deactivated
Chromadora, Inc.	1-511414	2515 S.Birch St, Santa Ana, CA 92707	332813	433.17(a)	8	24	23	Nickel, Total Toxic Organics [§433.11e]		
Circuit Technology, Inc.	1-521821	1911 N.Main St, Orange, CA 92865	334112	433.17(a)	6	31	8	Copper, pH		
City of Anaheim - Public Utilities Dept	1-021073	6751 E.Walnut Canyon Rd, Anaheim, CA 92807	221310	403.5(d)	4	16	56		Published as SNC for reporting violation(s)	
City Of Anaheim - Public Utilities Dept.	1-521862	1144 N.Kraemer Blvd, Anaheim, CA 92806	221112	403.5(d)	0	0	0			Class 1 Permit Deactivated
City of Anaheim Public Utilities (Water Services WRDF)	1-521843	210 S.Anaheim Blvd, Anaheim, CA 92805	221320	403.5(d)	4	12	0			
City of Anaheim, Canyon Power Plant	1-600296	3071 E.Miraloma Ave, Anaheim, CA 92806	221121	403.5(d)	4	27	2			
City of Huntington Beach Fire Department	1-111015	19081 Huntington St, Huntington Beach, CA 92648	211111	403.5(d)	4	2	2			
City of Newport Beach (West Coast Hwy - Oil Extraction)	1-600584	5810 West Coast Hwy, Newport Beach, CA 92660	211111	435.33(b)	4	16	24			
City of Tustin - Maintenance Yard	1-071058	1472 Service Rd, Tustin, CA 92780	921190	403.5(d)	5	26	16	Zinc		

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City of Tustin Water Service (17th St.)	1-071013	18602 E.17th St, Santa Ana, CA 92705	221310	403.5(d)	4	20	2			
City of Tustin, Water Service (Main St)	1-071268	235 E.Main St, Tustin, CA 92780	221310	403.5(d)	2	0	0			
CJ Foods Manufacturing Corp.	1-521849	500 State College Blvd, Fullerton, CA 92831	311824	403.5(d)	4	21	12			
CLA-VAL Co. Div. of Griswold Ind.	Z-361103	1701 Placentia Ave, Costa Mesa, CA 92627	332911	433.17(a)	0	0	0			
Coast to Coast Circuits, Inc.	1-111129	5332 Commercial St, Huntington Beach, CA 92649	334412	433.17(a)	4	30	62	Lead		
Coastline High Performance Coatings, LTD	1-600812	7181 Orangewood Ave, Garden Grove, CA 92841	332812	433.17(a)	6	2	2	Lead		
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	1-600708	7061 Patterson Dr, Garden Grove, CA 92841	332813	433.17(a)	5	29	10	CN, pH		
Columbine Associates	1-521784	4660 San Antonio Rd, E. on B St Dir, Yorba Linda, CA 92886	211111	403.5(d)	5	17	4			
Continuous Coating Corporation	1-021290	520 W.Grove Ave, Orange, CA 92865	332812	433.17(a), 465.15	4	26	20			
Cooper and Brain, Inc.	1-031070	1390 Site Dr, Brea, CA 92821	211111	435.33(b)	5	20	4		Published as SNC for reporting violation(s)	
Corru-Kraft Buena Park	1-600806	6200 Caballero Blvd, Buena Park, CA 90620	322211	403.5(d)	4	18	12			
Corru-Kraft Fullerton	1-601450	1911 E.Rosslynn Ave, Fullerton, CA 92831	322211	403.5(d)	3	19	3			New Class 1 Permit Issued

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CP-Carrillo, Inc. (Armstrong)	1-600920	17401 Armstrong Ave, Irvine, CA 92614	336310	433.17(a)	5	18	12			
CP-Carrillo, Inc. (McGaw)	1-571316	1902 McGaw Ave, Irvine, CA 92614	336310	403.5(d)	5	18	6	O&G min.		
CPPG, Inc.	Z-321813	3911 E.Miraloma Ave, Anaheim, CA 92806	332813	433.17(a)	1	0	0			
Crest Coating, Inc.	1-021289	1361 S.Allec St, Anaheim, CA 92805	332812	433.17(a)	4	29	8			
CRH California Water, Inc.	1-011051	502 S.Lyon St, Santa Ana, CA 92701	312112	403.5(d)	2	11	4			
Custom Enamellers, Inc.	1-021297	18340 Mount Baldy Cir, Fountain Valley, CA 92708	332812	433.17(a)	4	27	8			
Cytec Engineered Materials, Inc.	Z-600005	1440 N.Kraemer Blvd, Anaheim, CA 92806	325520	433.17(a)	0	0	0			
D.F. Stauffer Biscuit Co., Inc.	1-600414	4041 W.Garry Ave, Santa Ana, CA 92704	311821	403.5(d)	5	17	4			
Dae Shin USA, Inc.	1-031102	610 N.Gilbert St, Fullerton, CA 92833	313310	410.56	4	24	0			
DAH Oil, LLC	1-581173	18962 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	2	11	2			Class 1 Permit Deactivated
Darling Ingredients, Inc.	1-511378	2624 Hickory St, Santa Ana, CA 92707	562219	403.5(d)	5	27	6			
Data Aire, Inc. #2	1-021379	230 W.Blueridge Ave, Orange, CA 92865	332322	433.17(a)	5	21	9		Published as SNC for reporting violation(s)	
Data Electronic Services, Inc.	1-011142	410 Nantucket Pl, Santa Ana, CA 92703	334412	433.17(a)	4	26	61			

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Data Solder, Inc.	1-521761	2915 Kilson Dr, Santa Ana, CA 92707	334412	433.17(a)	4	26	8			
Dayton Flavors, Inc.	1-600038	580 S.Melrose St, Placentia, CA 92870	311930	403.5(d)	4	12	4			Formerly listed as Dayton Flavors, LLC
DCOR, LLC	1-111013	4541 Heil Ave, Huntington Beach, CA 92649	211111	403.5(d)	4	15	4			
Derm Cosmetic Labs, Inc.	Z-600455	6370 Altura Blvd, Buena Park, CA 90620	325611	417.156, 417.166, 417.66, 417.86	0	0	0			
Diamond Environmental Services, LP	1-600244	1801 Via Burton None, B Unit, Fullerton, CA 92832	532490	403.5(d)	4	22	4			
DNR Industries, Inc.	Z-601019	1562 S.Anahaim Blvd, A&B Ste, Anaheim, CA 92805	811111	433.17(a)	0	0	0			
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	1730 Raymer Ave, Fullerton, CA 92833	311930	403.5(d)	5	21	4	pH		
DRS Network & Imaging Systems, LLC	1-531405	10600 Valley View St, Cypress, CA 90630	334413	469.18(a)	5	1	15			
DS Services of America	1-021393	1522 N.Newhope St, Santa Ana, CA 92703	312112	403.5(d)	4	21	4			
Ducommun Aerostructures, Inc.	1-021105	1885 N.Batavia St, Orange, CA 92865	336413	433.17(a)	4	24	28			
Dunham Metal Plating Inc.	1-601023	1764 N.Case St, Orange, CA 92865	332813	433.17(a)	5	35	21	Zinc		
Dunham Metal Processing	1-021325	936 N.Parker St, Orange, CA 92867	332813	433.17(a)	4	20	8			

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E&B Natural Resources- Angus Petroleum Corporation	1-600254	1901 California St, Huntington Beach, CA 92648	211111	403.5(d)	4	20	8			
Earth Friendly Products	1-600739	11150 Hope St, Cypress, CA 90630	325611	417.166, 417.86	6	23	6			
Eco Pure LLC	1-601406	1920 Warner Ave, Suite 3-P , Santa Ana, CA 92705	812220	403.5(d)	5	14	3	pH		New Class 1 Permit Issued
EFT Fast Quality Service, Inc.	1-011064	2328 S.Susan St, Santa Ana, CA 92704	334112	433.17(a)	4	20	12	Nickel		
Electro Metal Finishing Corporation	1-021158	1194 N.Grove St, Anaheim, CA 92806	332812	433.17(a)	9	23	11	Zinc		
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	3110 W.Harvard St, Santa Ana, CA 92704	332813	433.17(a)	4	30	32	Cadmium, Chromium, Copper		
Electrolurgy, Inc.	1-071162	1121 Duryea Ave, Irvine, CA 92614	332813	433.17(a)	6	24	58	Cadmium, Zinc		
Electron Plating Inc.	1-021336	13932 Enterprise Dr, Garden Grove, CA 92843	332813	433.17(a)	5	26	21			
Electronic Precision Specialties, Inc.	1-021337	537 Mercury Ln, Brea, CA 92821	332813	433.17(a)	4	30	20			
Embee Processing (Anodize)	1-600456	2148 S.Hathaway St, Santa Ana, CA 92705	332813	413.14(c), 413.54(c), 413.64(c), 433.17(a)	8	33	24	CN	Published as SNC for discharge violation(s)	
Embee Processing (Plate)	1-600457	2144 S.Hathaway St, Santa Ana, CA 92705	332813	413.14(c), 413.54(c), 413.64(c), 413.74(c), 433.17(a)	6	31	17			
Emerald SoCal, LLC / Emerald Orange	1-601615	1575 N.Case St, Orange, CA 92867	812332	403.5(d)	2	10	1			New Class 1 Permit Issued

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Excello Circuits, Inc. (Hunter)	1-601356	5330 E.Hunter Ave, Anaheim, CA 92807	334412	433.17(a)	4	22	15		Published as SNC for reporting violation(s)	
Expo Dyeing and Finishing, Inc.	1-031322	1365 Knollwood Cir, Anaheim, CA 92801	313310	403.5(d)	4	21	0			
Fabrica International, Inc.	1-011278	3201 S.Susan St, Santa Ana, CA 92704	314110	403.5(d)	5	18	0			
Fabrication Concepts Corporation	1-011068	1800 E.Saint Andrew Pl, Santa Ana, CA 92705	332114	433.17(a)	4	30	16			
Fineline Circuits & Technology, Inc.	1-021121	594 Apollo St, Brea, CA 92821	334412	433.17(a)	4	26	8			
FMH Aerospace Corp.	1-600585	17072 Daimler St, Irvine, CA 92614	332912	433.17(a), 467.16, 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(w)	4	35	74		Published as SNC for reporting violation(s)	
FujiFilm Irvine Scientific, Inc.	1-600977	2511 Daimler St, Santa Ana, CA 92705	325414	439.47	4	64	20			
Fullerton Custom Works, Inc.	Z-331424	1163 E.Elm Ave, Fullerton, CA 92831	332813	433.17(a)	2	0	0			
Gallade Chemical, Inc.	1-011257	1230 E.Saint Gertrude Pl, Santa Ana, CA 92707	422690	403.5(d)	4	16	4			
Gemini Industries, Inc.	1-071172	2311 S.Pullman St, Santa Ana, CA 92705	331492	415.26, 421.266(b), 421.266(e), 421.266(i), 421.266(j), 421.266(m), 421.266(n)	3	12	9	pH		Class 1 Permit Deactivated
Gemtech Coatings	Z-600544	2737 S.Garnsey St, Santa Ana, CA 92707	332812	433.17(a)	2	0	0			

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GKN Aerospace Transparency Systems	1-531401	12122 Western Ave, Garden Grove, CA 92841	336413	403.5(d)	5	21	4			
Gold Coast Baking Company, Inc.	1-601700	1505 E. Warner Ave, Santa Ana, CA 92705	311812	403.5(d)	2	5	0			New Class 1 Permit Issued
Gomtech Electronics, Inc.	1-021352	990 N. Enterprise St, M Unit, Orange, CA 92867	334412	433.17(a)	2	2	1			Class 1 Permit Deactivated
Goodwin Company	1-031043	12361 Monarch St, Garden Grove, CA 92841	325611	403.5(d)	5	38	16	O&G min.		
Graphic Packaging International, Inc.	1-571314	1600 Barranca Pkwy, Irvine, CA 92606	322212	403.5(d)	4	20	4			
Harbor Truck Bodies, Inc.	1-021286	255 Voyager Ave, Brea, CA 92821	336370	433.17(a)	5	31	20			
Harry's Dye & Wash, Inc.	1-521746	1015 E. Orangethorpe Ave, Anaheim, CA 92801	313310	403.5(d)	5	23	12			
Hartwell Corporation	1-021381	900 Richfield Rd, Placentia, CA 92870	332999	403.5(d)	4	29	8	O&G min.	Published as SNC for discharge violation(s)	
Hellman Properties, LLC	1-600273	1650 Adolfo Lopez Dr, Seal Beach, CA 90740	211111	403.5(d)	4	19	6			
Hi Tech Solder	1-521790	700 Monroe Way, Placentia, CA 92870	334412	433.17(a)	4	25	60			
Hightower Plating & Manufacturing Co.	1-021185	2090 N. Glassell, Orange, CA 92865	332813	433.17(a)	6	36	24	Cadmium		
Hixson Metal Finishing	1-061115	829 & 835 Production Pl, Newport Beach, CA 92663	332813	433.17(a)	5	39	60			

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House Foods America Corporation (East)	1-600906	7351 Orangewood Ave, Garden Grove, CA 92841	311991	403.5(d)	21	24	0	pH		
House Foods America Corporation (West)	1-031072	7351 Orangewood Ave, Garden Grove, CA 92841	311224	403.5(d)	20	23	0			
Howmet Global Fastening Systems Inc.	1-021081	800 S.State College Blvd, Fullerton, CA 92831	332722	433.15(a), 433.17(a), 467.46, 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(w), 471.65(x)	4	55	30	Fluoride, pH		
Hyatt Die Cast & Engineering Corporation	Z-331236	4656 Lincoln Ave, Cypress, CA 90630	331523	464.16(a), 464.16(c), 464.16(h), 464.46(b), 464.46(d)	0	0	0			Formerly listed as Hyatt Die Casting & Engineering Corp.
Ideal Anodizing, Inc.	1-021041	1250 & 1270 N.Blue Gum St, Anaheim, CA 92806	332813	433.17(a)	4	30	8			
Ikon Powder Coating, Inc.	1-521756	1375 N.Miller St, Anaheim, CA 92806	332812	433.17(a)	7	20	12	Zinc		
Image Technology, Inc.	1-521755	1380 N.Knollwood Cir, Anaheim, CA 92801	325611	417.86	4	5	1			
Imuraya USA, Inc.	1-541178	2502 Barranca Pkwy, Irvine, CA 92606	311520	403.5(d)	5	24	4			
Independent Forge Company	Z-601008	692 N.Batavia St, Orange, CA 92868	332112	467.45	1	0	0			

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Industrial Coating, Inc.	Z-601061	2990 E.Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0			
Industrial Metal Finishing, Inc.	1-521828	1941 Petra Ln, Placentia, CA 92870	332813	403.5(d)	4	16	6			
Intec Products, Inc.	1-021399	1145 N.Grove St, Anaheim, CA 92806	314999	410.36, 410.46	4	18	4			
Integral Aerospace, LLC	1-600243	2036 E.Dyer Rd, Santa Ana, CA 92705	336413	433.17(a)	2	11	17	Zinc		Class 1 Permit Deactivated
International Paper Company (Anaheim)	1-521820	601 E.Ball Rd, Anaheim, CA 92805	322211	403.5(d)	4	27	8			
International Paper Company (Buena Park Bag)	1-531419	6485 Descanso Ave, Buena Park, CA 90620	322224	403.5(d)	4	18	6			
International Paper Company (Buena Park Container)	1-031171	6211 Descanso Ave, Buena Park, CA 90620	322211	403.5(d)	4	10	4			
Irvine Ranch Water District (Wells 21/22 Desalter)	1-571327	1221 Edinger Ave, Tustin, CA 92780	221310	403.5(d)	4	13	4			
Irvine Ranch Water District - DATS	1-011075	1704 W.Segerstrom Ave, Santa Ana, CA 92704	221310	403.5(d)	4	14	4			
IsoTis OrthoBiologics, Inc.	1-601134	2 Goodyear None, Irvine, CA 92618	339112	403.5(d)	4	12	2			
J & R Metal Finishing Co.	1-521823	307 N.Euclid Way, H1 Bldg, Anaheim, CA 92801	332812	403.5(d)	4	19	6			
J and J Operators LLC	1-601614	18962 Stewart Ln, Huntington Beach, CA 92648	211111	403.5(d)	1	9	1			New Class 1 Permit Issued

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J&J Marine Acquisition Co., LLC	1-551152	151 Shipyard Way, 7 Ste, Newport Beach, CA 92663	336611	403.5(d)	5	14	6			
JD Processing, Inc. (East)	1-511407	2220 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	4	34	20	Zinc		
JD Processing, Inc. (West)	1-600978	2310 Cape Cod Way, Santa Ana, CA 92703	332813	433.17(a)	2	0	0			New Class 1 Permit Issued
Jellco Container, Inc.	1-021402	1151 N.Tustin Ave, Anaheim, CA 92807	322212	403.5(d)	4	20	6			
JOHN A. THOMAS - BOLSA OIL	1-031065	18701 Edwards St, Huntington Beach, CA 92648	211111	403.5(d)	4	32	8			
Joint Forces Training Base, Los Alamitos	1-031270	4230 Constitution Ave, 35 Bldg, Los Alamitos, CA 90720	928110	403.5(d)	5	21	2			
Kenlen Specialities, Inc.	1-021171	11691 Coley River Cir, Fountain Valley, CA 92708	332812	433.17(a)	5	28	8			
Kinsbursky Brothers Supply, Inc.	1-021424	1314 N.Anahem Blvd, Anaheim, CA 92801	423930	403.5(d)	4	12	7			
Kirkhill, Inc. (North)	1-600608	300 E.Cypress St, Brea, CA 92821	339991	428.76(a)	4	25	8			
Kirkhill, Inc. (South)	1-600609	300 E.Cypress St, Brea, CA 92821	339991	428.76(a)	5	22	8			
Kraft Heinz Company	1-071056	2450 White Rd, Irvine, CA 92614	311941	403.5(d)	8	23	4		Published as SNC for reporting violation(s)	
Kryler Corporation	1-021428	1217 E.Ash Ave, Fullerton, CA 92831	332813	433.17(a), 433.17(b)	4	34	8			
Kyocera SGS Precision Tools, Inc.	1-511385	3565 Cadillac Ave, Costa Mesa, CA 92626	333515	403.5(d)	4	17	5			Formerly listed as Kyocera Precision Tools, Inc.

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La Habra Bakery	1-031029	850 S.Cypress St, La Habra, CA 90631	311812	403.5(d)	4	18	12			
La Habra Plating Company	Z-331399	900 S.Cypress, La Habra, CA 90631	332813	433.17(a)	1	0	0			
LGM Subsidiary Holdings LLC	1-601313	17802 Gillette Ave, Irvine, CA 92614	325412	439.47	4	59	30	acetone		
Lightning Diversion Systems LLC	1-600338	16572 Burke Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	22	8			
Linco Industries, Inc.	1-021253	528 S.Central Park Ave, West Dir, Anaheim, CA 92802	332812	433.17(a)	6	39	24	Cadmium, CN, Lead, pH, Zinc	Published as SNC for discharge violation(s)	
LM Chrome Corporation	1-511361	654 Young St, Santa Ana, CA 92705	332813	433.17(a)	4	28	20	CN		
Logi Graphics, Inc.	1-031049	17592 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	15	7	Copper, Lead	Published as SNC for reporting violation(s)	
M.S. Bellows	1-111007	5322 Mcfadden Ave, Huntington Beach, CA 92649	332813	433.17(a)	4	22	8			
Magma Finishing Corp.	Z-321810	2294 N.Batavia St, D Ste, Orange, CA 92865	332813	433.17(a)	1	0	0			
Magnetic Metals Corporation	1-531391	2475 W.La Palma Ave, Anaheim, CA 92801	334416	433.17(a)	5	21	8			
Manufactured Packaging Products	1-521793	3200 Enterprise St, Brea, CA 92821	322211	403.5(d)	4	22	6			
Manufactured Packaging Products (MPP Fullerton)	1-021681	1901 E.Rossllynn Ave, Fullerton, CA 92831	322211	403.5(d)	4	16	8			

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Markland Manufacturing, Inc.	1-011046	1111 E.McFadden Ave, Santa Ana, CA 92705	332813	433.17(a)	7	47	28			
Maruchan, Inc. (Deere)	1-071024	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	6	13	4	pH		
Maruchan, Inc. (Deere-South)	1-601021	1902 Deere Ave, Irvine, CA 92606	311824	403.5(d)	5	12	4			
Maruchan, Inc. (Laguna Cyn)	1-141015	15800 Laguna Canyon Rd, Irvine, CA 92618	311824	403.5(d)	4	14	8			
Marukome USA, Inc.	1-141023	17132 Pullman St, Irvine, CA 92614	311991	403.5(d)	6	20	4			
Master Wash, Inc.	1-511399	3120 Kilson St, Santa Ana, CA 92707	811192	403.5(d)	5	13	4			
McKenna Labs, Inc.	1-021422	1601 E.Orangethorpe Ave, Fullerton, CA 92831	325620	417.86	4	20	8			
MCP Foods, Inc.	1-021029	424 S.Atchison St, Anaheim, CA 92805	311942	403.5(d)	5	21	0			
Meggitt (Orange County), Inc.	1-601115	4 Marconi None, Irvine, CA 92618	334519	433.17(a)	6	14	20	Lead	Published as SNC for reporting violation(s)	
Merical, LLC	1-600655	233 E.Bristol Ln, Orange, CA 92865	325412	439.47	6	30	11		Published as SNC for reporting violation(s)	
Mesa Water District	1-061007	1350 Gisler Ave, Costa Mesa, CA 92626	221310	403.5(d)	4	18	8			
Micro Precision Swiss, LLC	Z-601490	3233 W.Harvard St, Santa Ana, CA 92704	339113	433.17(a)	0	0	0			New Zero Discharge Certification Issued
Micrometals, Inc.	1-021153	5615 E.La Palma Ave, Anaheim, CA 92807	334416	471.105(e)	4	26	6			

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MTC Corp	1-600443	11161 Slater Ave, Fountain Valley, CA 92708	336111	426.66	4	20	2			
Murrietta Circuits	1-521811	5000 E.Landon St, Anaheim, CA 92807	334418	433.17(a)	4	29	8			
Nalco Water Pretreatment Solutions, LLC	1-521748	1961 Petra Ln, Placentia, CA 92870	561990	403.5(d)	4	22	4			
National Construction Rentals	1-600652	1550 E.Chestnut Ave, Santa Ana, CA 92701	562991	403.5(d)	4	24	4			
Neutron Plating, Inc.	Z-321812	2993 E.Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0			
Newlight Technologies, Inc.	1-600888	14382 Astronautics Ln, Huntington Beach, CA 92647	325211	403.5(d)	4	40	7			
Newport Corporation	1-071038	1791 Deere Ave, Irvine, CA 92606	334516	403.5(d)	4	18	2			
Newport Fab, LLC dba Tower Semiconductor Newport Beach, Inc.	1-571292	4321 Jamboree Rd, Newport Beach, CA 92660	334413	469.18(a)	5	24	2			
Nikkiso ACD	Z-601703	2321 Pullman St, Santa Ana, CA 92705	334513	433.17(a)	2	0	0			New Zero Discharge Certification Issued
Nobel Biocare USA, LLC	1-521801	22725 Savi Ranch Pkwy, Yorba Linda, CA 92887	339114	433.17(a)	4	26	7			
Nor-Cal Beverage Co., Inc. (Main)	1-021284	1226 N.Olive St, Anaheim, CA 92801	312111	403.5(d)	5	22	0			
Nor-Cal Beverage Co., Inc. (NCB)	1-021283	1226 N.Olive St, Anaheim, CA 92801	312111	403.5(d)	0	0	0			Class 1 Permit Deactivated

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O'Donnell Oil Company, LLC	1-581191	7800 Palin Cir, Huntington Beach, CA 92648	211111	403.5(d)	4	0	0		Published as SNC for reporting violation(s)	
O.C. Waste & Recycling	1-141018	20661 Newport Coast Dr, Newport Beach, CA 92657	562910	403.5(d)	4	19	8			
Oakley, Inc.	1-141012	1 Icon, Foothill Ranch, CA 92610	339115	463.16, 463.26, 463.36	4	0	0			
Omni Metal Finishing, Inc.	1-021520	11665 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	5	26	15			
Omni Metal Finishing, Inc. (Building 4)	1-600981	11639 Coley River Cir, Fountain Valley, CA 92708	332813	433.17(a)	4	26	8			
Only Cremations for Pets (Newport Beach)	1-601084	4263 Birch St, B Ste, Newport Beach, CA 92660	812220	403.5(d)	4	13	4			
Only Cremations for Pets (Stanton)	1-601085	8101 Monroe Ave, Stanton, CA 90680	812220	403.5(d)	4	13	4		Published as SNC for reporting violation(s)	
Orange County Chemical Supply, Inc.	1-600766	10680 Fern Ave, Stanton, CA 90680	325611	417.86	5	23	4	O&G min.		
Ortronics, Inc.	Z-601203	1443 S.Sunkist St, Anaheim, CA 92806	423430	433.17(a)	0	0	0			
Pacific Chrome Services	Z-311396	603 E.Alton Ave, F Ste, Santa Ana, CA 92705	332813	433.17(a)	1	0	0			
Pacific Image Technology, Inc.	1-021070	1875 S.Santa Cruz St, Anaheim, CA 92805	334112	433.17(a)	4	31	8			
Pacific Western Container	1-511371	4044 W.Garry Ave, Santa Ana, CA 92704	322211	403.5(d)	4	18	4	Molybdenum		
Parker Hannifin Corporation	Z-600979	14300 Alton Pkwy, Irvine, CA 92618	332912	433.17(a)	1	0	0			

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Patriot Wastewater, LLC (Freedom CWT)	1-521861	314 W.Freedom Ave, Orange, CA 92865	562219	437.47(b)	4	44	39	4-Methylphenol		
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	314 W.Freedom Ave, Orange, CA 92865	562219	403.5(d)	5	24	11			
PCX Aerosystems - Santa Ana	1-601618	2040 E.Dyer Rd, Santa Ana, CA 92705	336413	433.17(a)	1	7	13	Zinc		New Class 1 Permit Issued
Performance Powder, Inc.	1-521805	2920 E.La Jolla St, Anaheim, CA 92806	332812	433.17(a)	4	36	7		Published as SNC for discharge and reporting violation(s)	
Petroprize Corporation	1-581180	319 20th St, Huntington Beach, CA 92648	211111	403.5(d)	4	16	4			
Pier Oil Company, Inc.	1-581178	201 2nd St, Huntington Beach, CA 92648	211111	403.5(d)	4	17	4			
Pioneer Circuits, Inc.	1-011262	3010 S.Shannon St, Santa Ana, CA 92704	334412	433.17(a)	4	27	20			
Platinum Surface Coating, Inc.	1-521852	1173 N.Fountain Way, Anaheim, CA 92806	332813	433.17(a)	8	20	11			
Plegel Oil Company (Blattner/Joe Johnson)	1-521864	900 Mammoth Way, Placentia, CA 92870	211111	403.5(d)	4	17	4			
Plegel Oil Company - (A.H.A.)	1-021176	16801 Rumson St, Yorba Linda, CA 92886	211111	403.5(d)	4	17	4			
Porter Powder Coating, Inc.	Z-321817	510 S.Rose St, Anaheim, CA 92805	332812	433.17(a)	0	0	0			
Powdercoat Professionals Inc.	Z-600275	2905 E.Blue Star St, Anaheim, CA 92806	332812	433.17(a)	1	0	0			

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Powdercoat Services, LLC (Bldg E / Plant 1)	1-600167	307 N.Euclid Way, E Bldg, Anaheim, CA 92801	332812	433.17(a)	5	18	8			
Powdercoat Services, LLC (Bldg J / Plant 3)	1-600168	237 N.Euclid Way, J Bldg, Anaheim, CA 92801	332812	433.17(a)	5	20	8			
PowderCoat Services, LLC. Plant 5	1-600355	1747 W.Lincoln Ave, L1 Bldg, Anaheim, CA 92801	332812	433.17(a)	5	18	9			
Power Distribution, Inc.	1-511400	4011 W.Carriage Dr, Santa Ana, CA 92704	335311	403.5(d)	4	22	5		Published as SNC for reporting violation(s)	
Powerdrive Oil & Gas Company, LLC (2nd)	1-600248	120 2nd St, Huntington Beach, CA 92648	211111	403.5(d)	4	21	4			
Precious Metals Plating Co., Inc.	1-011265	2635 Orange Ave, Santa Ana, CA 92707	332813	433.17(a)	4	33	17	Silver		
Precision Anodizing & Plating, Inc.	1-521809	1601 N.Miller St, Anaheim, CA 92806	332813	433.17(a)	4	32	20			
Precision Circuits West, Inc.	1-011008	3310 W.Harvard St, Santa Ana, CA 92704	334412	433.17(a)	4	24	8	Silver		
Precision Resource, California Division	1-111002	5803 Engineer Dr, Huntington Beach, CA 92649	332710	403.5(d)	4	20	8			
Precon, Inc.	1-021581	3131 E.La Palma Ave, Anaheim, CA 92806	332721	403.5(d)	4	27	21			
Prima-Tex Industries Inc.	1-031036	6237 Descanso Cir, Buena Park, CA 90620	313310	403.5(d)	4	22	4			
Prudential Overall Supply	1-071235	16901 Aston St, Irvine, CA 92606	812332	403.5(d)	4	25	8			
Pulmuone Foods USA, Inc. (East)	1-601443	2315 Moore Ave, Fullerton, CA 92833	311991	403.5(d)	3	16	0			New Class 1 Permit Issued

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Pulmuone Foods USA, Inc. (West)	1-531397	2315 Moore Ave, Fullerton, CA 92833	311991	403.5(d)	1	5	0			Class 1 Permit Deactivated
Q-Flex Inc.	1-600337	1301 E.Hunter Ave, Santa Ana, CA 92705	334418	433.17(a)	8	22	8	Copper		
Quality Aluminum Forge, LLC (Cypress North)	1-521833	814 N.Cypress St, Orange, CA 92867	332112	467.45	5	26	6		Published as SNC for reporting violation(s)	
Quality Aluminum Forge, LLC (Cypress South)	1-600272	794 N.Cypress St, Orange, CA 92867	332112	467.46	5	26	10		Published as SNC for reporting violation(s)	
Quiktum Professional Screenprinting	1-521858	567 S.Melrose St, Placentia, CA 92870	333249	403.5(d)	4	20	4			
Rayne Dealership Corporation	1-571303	17835 Sky Park Cir, M Ste, Irvine, CA 92614	454390	403.5(d)	4	21	2			
RBC Transport Dynamics Corp.	1-011013	3131 W.Segerstrom Ave, Santa Ana, CA 92704	336413	433.17(a)	4	35	17	Cadmium, Total Toxic Organics [§433.11e], Zinc		
Republic Waste Services	1-521827	2727 Coronado St, Anaheim, CA 92806	56211	403.5(d)	2	6	0			Class 1 Permit Deactivated
Republic Waste Services of So. Cal., LLC	1-021169	1235 N.Blue Gum St, Anaheim, CA 92806	562111	403.5(d)	2	7	0			Class 1 Permit Deactivated
Rich Products Corporation (North)	1-601022	3401 W.Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	18	4			
Rich Products Corporation (South)	1-511404	3401 W.Segerstrom Ave, Santa Ana, CA 92704	311812	403.5(d)	4	18	4			
Rigiflex Technology, Inc.	1-021187	1166 N.Grove St, Anaheim, CA 92806	334418	433.17(a)	5	33	13	Copper		

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Robinson Pharma, Inc. (Croddy)	1-511413	2632 S.Croddy Way, Santa Ana, CA 92704	325411	439.47	4	0	0			
Robinson Pharma, Inc. (Harbor North)	1-600126	2811 S.Harbor Blvd, Santa Ana, CA 92704	325412	439.47	4	23	20			
Robinson Pharma, Inc. (Harbor South)	1-511412	3330 S.Harbor Blvd, Santa Ana, CA 92704	325411	439.47	4	35	24			
Rolls-Royce HTC	1-600212	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	7	12	2			
Rolls-Royce HTC (fume scrubber)	1-600213	5730 Katella Ave, Cypress, CA 90630	541712	403.5(d)	4	12	2			
Rountree / Wright Enterprises, LLC	1-111028	114 14th St, 12&14/113 LotBlk, Huntington Beach, CA 92648	211111	403.5(d)	4	17	4			
RP Finishing	Z-601358	1226 E.Ash Ave, Fullerton, CA 92831	332812	433.17(a)	0	0	0			
RSS Manufacturing	Z-600635	1261 Logan Ave, Costa Mesa, CA 92626	332913	433.17(a)	3	0	0			
S & C Oil Co., Inc. (1)	1-581175	18742 Goldenwest St, Huntington Beach, CA 92649	211111	403.5(d)	3	17	2			Class 1 Permit Deactivated
S & C Oil Company, Inc. (2)	1-601637	18742 Goldenwest St, Huntington Beach, CA 92649	211111	403.5(d)	1	7	1			New Class 1 Permit Issued
Safety-Kleen Systems, Inc.	1-600690	2170 S.Yale St, Santa Ana, CA 92704	562211	403.5(d)	4	19	4			
Safran Electronics & Defense, Avionics USA, LLC.	1-571304	3184 Pullman St, Costa Mesa, CA 92626	335931	403.5(d)	4	21	4			Class 1 Permit Deactivated

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Sanitor Corporation	1-601267	8400 Cerritos Ave, Stanton, CA 90680	325620	417.86, 439.47	6	33	25	O&G min.	Published as SNC for discharge violation(s)	
Sanmina Corporation (Airway)	1-061008	2955 Airway Ave, Costa Mesa, CA 92626	334412	433.17(a)	4	30	20			
Sanmina Corporation (Redhill)	1-061009	2950 Red Hill Ave, Costa Mesa, CA 92626	334412	433.17(a)	4	30	20			
Santana Services	1-021016	1224 E.Ash Ave, Fullerton, CA 92831	332813	433.17(a)	4	18	8	Chromium		
Schreiber Foods, Inc.	1-021049	1901 Via Burton None, Fullerton, CA 92831	311511	403.5(d)	1	0	0			Class 1 Permit Deactivated
Scientific Spray Finishes, Inc.	1-031311	315 S.Richman Ave, Fullerton, CA 92832	332812	433.17(a)	4	26	8			
Semicoa	1-571313	333 McCormick Ave, Costa Mesa, CA 92626	334413	469.18(a)	5	22	10			
Serrano Water District	1-021137	5454 Taft Ave, Orange, CA 92867	221310	403.5(d)	5	11	2			
SFPP, LP	1-021619	1350 N.Main St, Orange, CA 92867	493190	403.5(d)	4	0	2			
Shepard Bros., Inc.	1-031034	503 S.Cypress St, La Habra, CA 90631	325611	417.166, 417.176	4	31	4			
Shur-Lok Company	1-600297	2541 White Rd, Irvine, CA 92614	332721	433.17(a)	4	0	0			
Simply Fresh, LLC	1-600709	6535 Caballero Blvd, Buena Park, CA 90620	311421	403.5(d)	4	18	12			
Sirco Industrial, Inc.	1-600706	5312 System Dr, Huntington Beach, CA 92649	423830	403.5(d)	4	22	10			

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Soldermask, Inc.	1-031341	17905 Metzler Ln, Huntington Beach, CA 92647	334412	433.17(a)	4	26	20			
South Coast Baking, LLC	1-600565	1711 Kettering St, Irvine, CA 92614	311821	403.5(d)	7	24	4			
South Coast Circuits, Inc. (Bldg 3500 A)	1-011069	3500 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	0	0	3			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3500 Ste A)	1-601444	3500 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	3	25	21	Silver		New Class 1 Permit Issued
South Coast Circuits, Inc. (Bldg 3506 A)	1-011030	3506 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	0	0	1			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3506 Ste A)	1-601446	3506 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	3	27	11			New Class 1 Permit Issued
South Coast Circuits, Inc. (Bldg 3512 A)	1-511365	3512 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	0	0	3			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3512 Ste A)	1-601445	3512 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	3	23	21			New Class 1 Permit Issued
South Coast Circuits, Inc. (Bldg 3524 A)	1-011054	3524 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	1	3	1			Class 1 Permit Deactivated
South Coast Circuits, Inc. (Bldg 3524 Ste A)	1-601447	3524 W.Lake Center Dr, A Bldg, Santa Ana, CA 92704	334412	433.17(a)	3	23	11			New Class 1 Permit Issued
South Coast Water	1-511405	401 S.Santa Fe St, Santa Ana, CA 92705	333318	403.5(d)	5	20	6			

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Southern California Edison #1 (Mt)	1-031014	7301 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	15	2			
Southern California Edison #2 (Das)	1-031015	7351 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	13	2			
Southern California Edison #3 (Lars)	1-031016	7455 Fenwick Ln, Westminster, CA 92683	811310	403.5(d)	4	15	2			
Spectrum Paint And Powder, Inc.	Z-321822	1332 S.Allec St, Anaheim, CA 92805	332812	433.17(a)	1	0	0			
Speedy Metals, Inc. DBA Pacific Metal Cutting	1-600767	730 Monroe Way, Placentia, CA 92870	332710	403.5(d)	5	30	11	O&G min.		
SPS Technologies LLC, DBA Cherry Aerospace	1-511381	1224 E. Warner Ave, Santa Ana, CA 92705	332722	433.17(a), 467.46, 467.66, 471.35(ee), 471.35(f), 471.35(ff), 471.35(j), 471.35(l), 471.35(m), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(w), 471.65(g), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(x)	4	58	39			

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Stainless Micro-Polish, Inc.	1-021672	1286 N.Grove St, Anaheim, CA 92806	332813	433.17(a)	5	30	12	Nickel		
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	341 W.Collins Ave, Orange, CA 92867	332119	403.5(d)	5	19	94	O&G min.		
Star Powder Coating, Inc.	1-531425	7601 Park Ave, Garden Grove, CA 92841	332812	433.17(a)	6	18	8			
Statek Corporation (Main)	1-021664	512 N.Main St, Orange, CA 92868	334419	433.17(a), 469.26(a)	7	32	6	pH		
Statek Corporation (Orange Grove)	1-521777	1449 W.Orange Grove Ave, B Ste, Orange, CA 92868	334419	469.28(a)	6	31	2	pH		
Stepan Company	1-021674	1208 N.Patt St, Anaheim, CA 92801	325613	417.106, 417.146, 417.166	7	21	8	1,4-dioxane		
Stremicks Heritage Foods, LLC	1-021028	4002 Westminster Ave, Santa Ana, CA 92703	311511	405.16, 405.26, 405.76	5	22	0			
Summit Interconnect, Inc.	1-600012	223 N.Crescent Way, Anaheim, CA 92801	334412	433.17(a)	5	34	25	Copper		
Summit Interconnect, Inc., Orange Division	1-600060	230 W.Bristol Ln, Orange, CA 92865	334412	433.17(a)	4	30	20			
Sunny Delight Beverages Co.	1-021045	1230 N.Tustin Ave, Anaheim, CA 92807	312111	403.5(d)	4	17	0			
Superior Plating	1-021090	1901 E.Cerritos Ave, Anaheim, CA 92805	332813	433.17(a)	7	23	72	Cadmium		

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
SUPERIOR PROCESSING (1)	1-021403	1115 Las Brisas Pl, Placentia, CA 92870	334412	433.17(a)	4	25	11			Class 1 Permit Deactivated Formerly listed as Superior Processing
Superior Processing (2)	1-601701	1115 Las Brisas Pl, Placentia, CA 92870	334412	433.17(a)	0	0	3			New Class 1 Permit Issued
T.A.C. West, Inc.	1-601678	1160 N.Fee Ana St, Anaheim, CA 92807	811192	403.5(d)	1	20	4	pH		Class 1 / 2 Permit Deactivated
Tayco Engineering, Inc.	1-031012	10874 Hope St, Cypress, CA 90630	334513	433.17(a)	7	18	8			
Taylor-Dunn Manufacturing Company	1-021123	2114 Ball Rd, Anaheim, CA 92804	333924	433.17(a)	4	25	8	Zinc		Class 1 Permit Deactivated
Taylor-Dunn Manufacturing, LLC (waev)	1-601699	2114 W.Ball Rd, Anaheim, CA 92804	333924	433.17(a)	0	0	0			New Class 1 Permit Issued
Terra Universal, Inc.	1-601407	800 S.Raymond Ave, Fullerton, CA 92831	333999	433.17(a)	3	19	8			New Class 1 Permit Issued
Teva Parenteral Medicines, Inc.	1-141007	19 Hughes, Irvine, CA 92618	325412	439.47	5	35	5			
Thermal-Vac Technology, Inc.	1-021282	1221 W.Struck Ave, Orange, CA 92867	332410	433.17(a)	5	28	20			
Thompson Energy Resources, LLC	1-521773	3351 E.Birch St, Brea, CA 92821	211111	403.5(d)	1	6	0			Class 1 Permit Deactivated
Thompson Energy Resources, LLC (Brea)	1-601469	3351 E.Birch St, Brea, CA 92821	211111	403.5(d)	3	23	11	O&G min.	Published as SNC for reporting violation(s)	New Class 1 Permit Issued
Timken Bearing Inspection, Inc.	1-531415	4422 Corporate Center Dr, Los Alamitos, CA 90720	336412	433.17(a)	4	25	10	CN		

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Facility	Permit No.	Address	NAICS Code	Regulation	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Tiodize Company, Inc.	1-111132	15701 Industry Ln, Huntington Beach, CA 92649	332813	433.17(a)	4	30	20			
Toyota Racing Development	1-071059	335 Baker St, Costa Mesa, CA 92626	336310	403.5(d)	4	18	15			
Transline Technology, Inc.	1-021202	1106 S. Technology Cir, Anaheim, CA 92805	334412	433.17(a)	4	29	8			
Tropitone Furniture Co., Inc.	1-141163	5 Marconi, Irvine, CA 92618	337124	433.17(a)	5	30	5			
TTM Technologies North America, LLC. (Coronado)	1-521859	3140 E. Coronado St, Anaheim, CA 92806	334412	433.17(a)	5	34	32	Copper		
TTM Technologies North America, LLC. (Croddy)	1-511366	2645 Croddy Way, Santa Ana, CA 92704	334412	433.17(a)	4	28	24			
TTM Technologies North America, LLC. (Harbor)	1-511359	2640 S. Harbor Blvd, Santa Ana, CA 92704	334412	433.17(a)	4	28	20			
United Pharma, LLC	1-531418	2317 Moore Ave, Fullerton, CA 92833	325412	403.5(d)	4	32	4			
Universal Molding Co.	1-521836	1551 E. Orangethorpe Ave, Fullerton, CA 92831	332812	433.17(a)	4	30	8			
Van Law Food Products, Inc.	1-600810	2325 Moore Ave, Fullerton, CA 92833	311941	403.5(d)	4	20	0			
Vi-Cal Metals, Inc.	1-521846	1400 N. Baxter St, Anaheim, CA 92806	423930	403.5(d)	6	20	2		Published as SNC for reporting violation(s)	
Vit-Best Nutrition, Inc.	1-600010	2832 Dow Ave, Tustin, CA 92780	325412	439.47	5	63	14			
Vit-Best Nutrition, Inc.	Z-600960	2802 Dow Ave, Tustin, CA 92780	325412	439.47	3	0	0			

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Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	1-601581	16122 Construction Cir, West , Irvine, CA 92606	562212	403.5(d)	3	14	3			New Class 1 Permit Issued
Weber Precision Graphics	1-011354	2730 Shannon St, Santa Ana, CA 92704	323113	403.5(d)	4	14	4			
Weidemann Water Conditioners, Inc. (Anaheim)	1-600520	1260 N.Sunshine Way, Anaheim, CA 92806	333318	403.5(d)	4	24	4			
Weidemann Water Conditioners, Inc. (Fullerton)	1-021653	1702 E.Rosslynn Ave, Fullerton, CA 92831	333318	403.5(d)	4	21	4			
West Newport Oil Company	1-061110	1080 W.17th St, Costa Mesa, CA 92627	211111	403.5(d)	4	0	8			
Wilco-Placentia Oil Operator, LLC	1-521829	550 Richfield Rd, Placentia, CA 92870	211111	403.5(d)	4	27	4			
Winonics (Brea)	1-031035	660 N.Puente St, Brea, CA 92821	334412	433.17(a)	7	36	9	Copper		
Winonics, Inc.	1-021735	1257 S.State College Blvd, Fullerton, CA 92831	334412	433.17(a)	4	45	21	Copper		
Yakult USA, Inc.	1-521850	17235 Newhope St, Fountain Valley, CA 92708	311511	403.5(d)	6	20	12			

Appendix B. Summary of Priority Pollutants and Trace Constituents Analyses

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21		Aug 21		Sep 21		Oct 21		Nov 21		Dec 21		Jan 22		Feb 22		Mar 22		Apr 22		May 22		Jun 22	
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
EFF-001	Silver	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Arsenic	3.64	µg/L	3.51	µg/L	3.29	µg/L	3.60	µg/L	3.56	µg/L	2.77	µg/L	2.77	µg/L	2.98	µg/L	3.19	µg/L	3.40	µg/L	3.26	µg/L	2.70	µg/L
	Beryllium	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Cadmium	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Cyanide	4.63	µg/L	ND	µg/L	6.95	µg/L	6.08	µg/L	3.61	µg/L	4.73	µg/L	5.07	µg/L	2.94	µg/L	4.12	µg/L	5.66	µg/L	3.83	µg/L	4.17	µg/L
	Chromium	1.21	µg/L	1.32	µg/L	3.76	µg/L	4.29	µg/L	2.68	µg/L	1.20	µg/L	1.16	µg/L	1.55	µg/L	1.18	µg/L	1.13	µg/L	1.05	µg/L	0.930	µg/L
	Copper	19.4	µg/L	5.00	µg/L	3.66	µg/L	15.6	µg/L	3.74	µg/L	5.22	µg/L	4.08	µg/L	5.54	µg/L	5.74	µg/L	4.62	µg/L	4.24	µg/L	4.22	µg/L
	Mercury	4.2	ng/L	4	ng/L	4.5	ng/L	4.9	ng/L	26	ng/L	5.3	ng/L	4	ng/L	4.1	ng/L	4	ng/L	4.1	ng/L	3.2	ng/L	5	ng/L
	Nickel	8.29	µg/L	8.22	µg/L	11.2	µg/L	12.5	µg/L	9.72	µg/L	10.9	µg/L	8.00	µg/L	10.4	µg/L	10.6	µg/L	11.0	µg/L	8.78	µg/L	8.28	µg/L
	1,1,1-Trichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,1,2,2-Tetrachloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,1,2-Trichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,1-Dichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,2-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,2-Dichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,2-Dichloropropane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,3-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,4-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,3,7,8-Tetrachlorodibenzo-P-Dioxin	ND	pg/L					ND	pg/L					ND	pg/L					ND	pg/L				
	2,4,6-Trichlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dichlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dimethylphenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dinitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dinitrotoluene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,6-Dinitrotoluene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chloronaphthalene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Nitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chloroethylvinylether	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	3,3-Dichlorobenzidine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Methyl-4,6-Dinitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Bromophenyl-Phenyl Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chloro-3-Methylphenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chlorophenyl-Phenyl Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Nitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
EFF-001	Aldrin	ND	µg/L										
	Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (a) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzydine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (a) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (b) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (g,h,i) Perylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (k) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Butyl Benzyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chlordane	ND	µg/L										
	Chrysene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Butyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Octyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dibenzo (a,h) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dieldrin	ND	µg/L										
	Diethylphthalate	ND	µg/L	ND	µg/L	2.53	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dimethylphthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Endosulfan	ND	µg/L										
	Endosulfan I	ND	µg/L										
	Endosulfan II	ND	µg/L										
	Endosulfan Sulfate	ND	µg/L										
	Endrin	ND	µg/L										
	Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Fluorene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Heptachlor	ND	µg/L										
	Hexachlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Hexachlorobutadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Hexachlorocyclopentadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Hexachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Indeno (1,2,3-cd) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Isophorone	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Nitrobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
PCB - 1016	ND	µg/L											
PCB - 1221	ND	µg/L											
PCB - 1232	ND	µg/L											
PCB - 1242	ND	µg/L											
PCB - 1248	ND	µg/L											

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
EFF-001	PCB - 1254	ND	µg/L					ND	µg/L				
	PCB - 1260	ND	µg/L					ND	µg/L				
	Pentachlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Phenanthrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Phenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acrolein	ND	µg/L				ND	µg/L				ND	µg/L
	Acrylonitrile	ND	µg/L				ND	µg/L				ND	µg/L
	Alpha-BHC	ND	µg/L						ND	µg/L			
	Benzene	ND	µg/L				ND	µg/L				ND	µg/L
	Beta-BHC	ND	µg/L						ND	µg/L			
	Bis (2-Chloroethoxy) Methane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Chloroethyl) Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Ethylhexyl) Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Bromodichloromethane	3.54	µg/L				1.65	µg/L				3.43	µg/L
	Bromoform	ND	µg/L				ND	µg/L				ND	µg/L
	Bromomethane	ND	µg/L				ND	µg/L				ND	µg/L
	Carbon Tetrachloride	ND	µg/L				ND	µg/L				ND	µg/L
	Chlorobenzene	ND	µg/L				ND	µg/L				ND	µg/L
	Chloroethane	ND	µg/L				ND	µg/L				ND	µg/L
	Chloroform	6.99	µg/L				5.73	µg/L				9.09	µg/L
	cis-1,3-Dichloropropene	ND	µg/L				ND	µg/L				ND	µg/L
	Delta-BHC	ND	µg/L						ND	µg/L			
	Dibromochloromethane	1.27	µg/L				ND	µg/L				ND	µg/L
	Ethylbenzene	ND	µg/L				ND	µg/L				ND	µg/L
	Gamma-BHC	ND	µg/L						ND	µg/L			
	Methylene Chloride	ND	µg/L				6.36	µg/L				ND	µg/L
	N-Nitrosodipropylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	N-Nitrosodimethylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	N-Nitrosodiphenylamine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4,4'-DDD	ND	µg/L						ND	µg/L			
	4,4'-DDE	ND	µg/L						ND	µg/L			
	4,4'-DDT	ND	µg/L						ND	µg/L			
Tetrachloroethene	ND	µg/L				ND	µg/L				ND	µg/L	
Toluene	ND	µg/L				ND	µg/L				ND	µg/L	
trans-1,2-Dichloroethene	ND	µg/L				ND	µg/L				ND	µg/L	
trans-1,3-Dichloropropene	ND	µg/L				ND	µg/L				ND	µg/L	
Trichloroethene	ND	µg/L				ND	µg/L				ND	µg/L	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22												
EFF-001	Vinyl Chloride	ND	µg/L				ND	µg/L				ND	µg/L												
	Lead	0.890	µg/L	0.350	µg/L	0.240	µg/L	1.51	µg/L	ND	µg/L	ND	µg/L	0.220	µg/L	ND	µg/L	0.170	µg/L	0.200	µg/L				
	Antimony	1.11	µg/L	1.27	µg/L	1.08	µg/L	1.31	µg/L	1.23	µg/L	1.32	µg/L	1.14	µg/L	1.11	µg/L	1.17	µg/L	1.65	µg/L	1.29	µg/L	1.36	µg/L
	Selenium	13.9	µg/L	11.2	µg/L	11.5	µg/L	13.0	µg/L	12.1	µg/L	10.4	µg/L	9.86	µg/L	10.7	µg/L	9.54	µg/L	10.7	µg/L	14.1	µg/L	11.6	µg/L
	Thallium	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Zinc	28.3	µg/L	25.3	µg/L	25.8	µg/L	30.3	µg/L	26.2	µg/L	28.2	µg/L	28.4	µg/L	29.1	µg/L	33.5	µg/L	26.3	µg/L	26.2	µg/L	26.3	µg/L
INF-001	Silver	0.670	µg/L	0.540	µg/L	0.890	µg/L	1.06	µg/L	0.590	µg/L	1.18	µg/L	0.450	µg/L	0.720	µg/L	0.775	µg/L	0.669	µg/L	0.813	µg/L	0.679	µg/L
	Arsenic	2.81	µg/L	2.96	µg/L	2.68	µg/L	2.65	µg/L	2.32	µg/L	2.79	µg/L	2.54	µg/L	2.49	µg/L	2.73	µg/L	2.39	µg/L	2.39	µg/L	2.50	µg/L
	Beryllium	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Cadmium	0.690	µg/L	0.280	µg/L	0.290	µg/L	0.330	µg/L	0.350	µg/L	0.290	µg/L	0.280	µg/L	0.600	µg/L	0.270	µg/L	0.350	µg/L	0.380	µg/L	0.480	µg/L
	Cyanide	1.65	µg/L	ND	µg/L	3.84	µg/L	1.69	µg/L	ND	µg/L	2.54	µg/L	ND	µg/L	2.94	µg/L	2.70	µg/L	3.13	µg/L	2.42	µg/L	3.11	µg/L
	Chromium	5.52	µg/L	4.73	µg/L	4.64	µg/L	4.89	µg/L	4.88	µg/L	5.37	µg/L	4.65	µg/L	11.8	µg/L	5.36	µg/L	5.08	µg/L	4.48	µg/L	4.09	µg/L
	Copper	86.7	µg/L	96.9	µg/L	89.4	µg/L	79.0	µg/L	58.4	µg/L	91.7	µg/L	81.3	µg/L	70.6	µg/L	76.9	µg/L	72.2	µg/L	73.7	µg/L	78.8	µg/L
	Mercury	120	ng/L	220	ng/L	120	ng/L	75	ng/L	92	ng/L	110	ng/L	100	ng/L	62	ng/L	290	ng/L	95	ng/L	94	ng/L	120	ng/L
	Nickel	10.0	µg/L	8.24	µg/L	8.42	µg/L	7.50	µg/L	6.27	µg/L	12.4	µg/L	8.34	µg/L	9.92	µg/L	12.4	µg/L	9.49	µg/L	7.61	µg/L	7.13	µg/L
	1,1,1-Trichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,1,2,2-Tetrachloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,1,2-Trichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,1-Dichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,2-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,2-Dichloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,2-Dichloropropane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	1,3-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,4-Dichlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4,6-Trichlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dichlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dimethylphenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dinitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,4-Dinitrotoluene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2,6-Dinitrotoluene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chloronaphthalene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Nitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Chloroethylvinylether	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	3,3-Dichlorobenzidine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.810	µg/L	0.650	µg/L
	2-Methyl-4,6-Dinitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
4-Bromophenyl-Phenyl Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21		Aug 21		Sep 21		Oct 21		Nov 21		Dec 21		Jan 22		Feb 22		Mar 22		Apr 22		May 22		Jun 22			
		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
INF-001	4-Chloro-3-Methylphenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	4-Chlorophenyl-Phenyl Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	4-Nitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Acenaphthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Acenaphthylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Aldrin	ND	µg/L											ND	µg/L												
	Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	1,2-Diphenylhydrazine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Benzo (a) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Benzenidine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Benzo (a) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Benzo (b) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Benzo (g,h,i) Perylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Benzo (k) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Butyl Benzyl Phthalate	1.68	µg/L	ND	µg/L	4.26	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	0.550	µg/L	0.510	µg/L
	Chlordane	ND	µg/L											ND	µg/L												
	Chrysene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L		
	Di-n-Butyl Phthalate	1.27	µg/L	0.870	µg/L	1.68	µg/L	0.720	µg/L	0.980	µg/L	0.870	µg/L	0.780	µg/L	0.640	µg/L	0.800	µg/L	0.590	µg/L	0.560	µg/L	0.480	µg/L		µg/L
	Di-n-Octyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dibenzo (a,h) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dieldrin	ND	µg/L											ND	µg/L												
	Diethylphthalate	3.13	µg/L	3.14	µg/L	4.07	µg/L	2.53	µg/L	4.21	µg/L	6.20	µg/L	2.56	µg/L	1.86	µg/L	2.80	µg/L	2.98	µg/L	2.80	µg/L	2.93	µg/L		µg/L
	Dimethylphthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Endosulfan	ND	µg/L											ND	µg/L												
	Endosulfan I	ND	µg/L											ND	µg/L												
	Endosulfan II	ND	µg/L											ND	µg/L												
	Endosulfan Sulfate	ND	µg/L											ND	µg/L												
	Endrin	ND	µg/L											ND	µg/L												
	Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Fluorene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Heptachlor	ND	µg/L											ND	µg/L												
	Hexachlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
Hexachlorobutadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Hexachlorocyclopentadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Hexachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Indeno (1,2,3-cd) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Isophorone	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	
Nitrobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22												
INF-001	PCB - 1016	ND	µg/L								ND	µg/L													
	PCB - 1221	ND	µg/L								ND	µg/L													
	PCB - 1232	ND	µg/L								ND	µg/L													
	PCB - 1242	ND	µg/L								ND	µg/L													
	PCB - 1248	ND	µg/L								ND	µg/L													
	PCB - 1254	ND	µg/L								ND	µg/L													
	PCB - 1260	ND	µg/L								ND	µg/L													
	Pentachlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L				
	Phenanthrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L				
	Phenol	23.1	µg/L	16.9	µg/L	16.4	µg/L	13.7	µg/L	18.4	µg/L	19.0	µg/L	15.8	µg/L	13.1	µg/L	20.5	µg/L	16.5	µg/L	16.7	µg/L	16.7	µg/L
	Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acrolein	ND	µg/L					ND	µg/L					ND	µg/L				0.470	µg/L					
	Acrylonitrile	ND	µg/L					ND	µg/L					ND	µg/L										
	Alpha-BHC	ND	µg/L											ND	µg/L										
	Benzene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Beta-BHC	ND	µg/L											ND	µg/L										
	Bis (2-Chloroethoxy) Methane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Chloroethyl) Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Ethylhexyl) Phthalate	8.47	µg/L	8.15	µg/L	9.79	µg/L	6.39	µg/L	8.12	µg/L	8.14	µg/L	6.37	µg/L	4.23	µg/L	5.46	µg/L	3.52	µg/L	5.18	µg/L	7.40	µg/L
	Bromodichloromethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Bromoform	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Bromomethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Carbon Tetrachloride	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Chlorobenzene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Chloroethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Chloroform	3.23	µg/L					2.62	µg/L					2.53	µg/L					2.61	µg/L				
	cis-1,3-Dichloropropene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Delta-BHC	ND	µg/L											ND	µg/L										
	Dibromochloromethane	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Ethylbenzene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Gamma-BHC	ND	µg/L											ND	µg/L										
	Methylene Chloride	1.89	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	N-Nitrosodipropylamine	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L
	N-Nitrosodimethylamine	ND	µg/L	75.0	ng/L	ND	µg/L	47.0	ng/L	ND	µg/L	ND	ng/L	37.0	ng/L	ND	µg/L	ND	ng/L	118	ng/L	ND	µg/L	ND	ng/L
N-Nitrosodiphenylamine	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	ND	µg/L	ND	ng/L	
4,4'-DDD	ND	µg/L											ND	µg/L											
4,4'-DDE	ND	µg/L											ND	µg/L											
4,4'-DDT	ND	µg/L											ND	µg/L											

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21		Aug 21		Sep 21		Oct 21		Nov 21		Dec 21		Jan 22		Feb 22		Mar 22		Apr 22		May 22		Jun 22	
	Tetrachloroethene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Toluene	1.83	µg/L					1.45	µg/L					ND	µg/L					ND	µg/L				
	trans-1,2-Dichloroethene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	trans-1,3-Dichloropropene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Trichloroethene	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	Vinyl Chloride	ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
	2,3,7,8-tetrachlorodibenzo-p-dioxin							ND	pg/L					ND	pg/L					ND	pg/L				
	Lead	2.52	µg/L	3.34	µg/L	2.06	µg/L	3.09	µg/L	1.65	µg/L	2.15	µg/L	1.79	µg/L	1.73	µg/L	1.90	µg/L	1.77	µg/L	1.85	µg/L	1.99	µg/L
	Antimony	1.14	µg/L	0.990	µg/L	0.970	µg/L	1.41	µg/L	0.870	µg/L	1.14	µg/L	1.23	µg/L	0.970	µg/L	1.11	µg/L	2.45	µg/L	1.16	µg/L	1.21	µg/L
	Selenium	3.54	µg/L	3.74	µg/L	2.08	µg/L	2.84	µg/L	3.09	µg/L	3.12	µg/L	3.11	µg/L	2.56	µg/L	2.53	µg/L	2.90	µg/L	3.91	µg/L	3.25	µg/L
	Thallium	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Zinc	163	µg/L	176	µg/L	155	µg/L	161	µg/L	142	µg/L	156	µg/L	131	µg/L	157	µg/L	162	µg/L	132	µg/L	156	µg/L	147	µg/L
	INF-002	Silver	0.570	µg/L	0.510	µg/L	0.510	µg/L	0.540	µg/L	0.520	µg/L	0.380	µg/L	0.400	µg/L	0.430	µg/L	0.635	µg/L	0.498	µg/L	0.415	µg/L	0.387
Arsenic		4.23	µg/L	4.07	µg/L	4.19	µg/L	5.03	µg/L	4.94	µg/L	3.98	µg/L	4.65	µg/L	4.53	µg/L	4.95	µg/L	5.99	µg/L	4.02	µg/L	4.03	µg/L
Beryllium		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
Cadmium		0.340	µg/L	0.280	µg/L	0.320	µg/L	0.420	µg/L	0.380	µg/L	0.410	µg/L	0.330	µg/L	0.340	µg/L	0.350	µg/L	0.350	µg/L	0.320	µg/L	0.300	µg/L
Cyanide		3.00	µg/L	ND	µg/L	2.78	µg/L	2.71	µg/L	2.70	µg/L	2.78	µg/L	6.48	µg/L	3.64	µg/L	7.22	µg/L	5.37	µg/L	ND	µg/L	19.0	µg/L
Chromium		8.09	µg/L	5.67	µg/L	5.92	µg/L	7.36	µg/L	7.38	µg/L	7.03	µg/L	7.84	µg/L	6.49	µg/L	8.13	µg/L	7.58	µg/L	5.96	µg/L	5.97	µg/L
Copper		60.9	µg/L	50.9	µg/L	50.4	µg/L	52.7	µg/L	53.5	µg/L	45.6	µg/L	50.0	µg/L	45.2	µg/L	55.2	µg/L	56.3	µg/L	47.4	µg/L	46.1	µg/L
Mercury		96	ng/L	85	ng/L	88	ng/L	78	ng/L	62	ng/L	39	ng/L	84	ng/L	43	ng/L	97	ng/L	68	ng/L	62	ng/L	78	ng/L
Nickel		6.51	µg/L	7.31	µg/L	6.74	µg/L	6.58	µg/L	6.05	µg/L	7.65	µg/L	6.77	µg/L	9.95	µg/L	13.9	µg/L	9.16	µg/L	5.86	µg/L	5.86	µg/L
1,1,1-Trichloroethane		ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
1,1,2,2-Tetrachloroethane		ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
1,1,2-Trichloroethane		ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
1,1-Dichloroethane		ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
1,2-Dichlorobenzene		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
1,2-Dichloroethane		ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
1,2-Dichloropropane		ND	µg/L					ND	µg/L					ND	µg/L					ND	µg/L				
1,3-Dichlorobenzene		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
1,4-Dichlorobenzene		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
2,4,6-Trichlorophenol		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
2,4-Dichlorophenol		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
2,4-Dimethylphenol		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
2,4-Dinitrophenol		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
2,4-Dinitrotoluene		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
2,6-Dinitrotoluene		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
2-Chloronaphthalene		ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
INF-002	2-Chlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Nitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	1.82	µg/L	ND	µg/L	ND	µg/L
	2-Chloroethylvinylether	ND	µg/L				ND	µg/L				ND	µg/L
	3,3-Dichlorobenzidine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	2-Methyl-4,6-Dinitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Bromophenyl-Phenyl Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chloro-3-Methylphenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Chlorophenyl-Phenyl Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	4-Nitrophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acenaphthylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Aldrin	ND	µg/L										
	Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	1,2-Diphenylhydrazine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (a) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzdine	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (a) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (b) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (g,h,i) Perylene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Benzo (k) Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Butyl Benzyl Phthalate	ND	µg/L	ND	µg/L	4.10	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Chlordane	ND	µg/L							ND	µg/L		
	Chrysene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Di-n-Butyl Phthalate	ND	µg/L	ND	µg/L	1.52	µg/L	ND	µg/L	0.690	µg/L	0.670	µg/L
	Di-n-Octyl Phthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dibenzo (a,h) Anthracene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Dieldrin	ND	µg/L										
	Diethylphthalate	2.31	µg/L	3.16	µg/L	8.24	µg/L	1.79	µg/L	2.24	µg/L	1.96	µg/L
	Dimethylphthalate	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Endosulfan	ND	µg/L										
	Endosulfan I	ND	µg/L										
	Endosulfan II	ND	µg/L										
	Endosulfan Sulfate	ND	µg/L										
	Endrin	ND	µg/L										
	Fluoranthene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Fluorene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Heptachlor	ND	µg/L										
	Hexachlorobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22												
INF-002	Hexachlorobutadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	Hexachlorocyclopentadiene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	Hexachloroethane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	Indeno (1,2,3-cd) Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	Isophorone	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	Nitrobenzene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L												
	PCB - 1016	ND	µg/L						ND	µg/L															
	PCB - 1221	ND	µg/L						ND	µg/L															
	PCB - 1232	ND	µg/L						ND	µg/L															
	PCB - 1242	ND	µg/L						ND	µg/L															
	PCB - 1248	ND	µg/L						ND	µg/L															
	PCB - 1254	ND	µg/L						ND	µg/L															
	PCB - 1260	ND	µg/L						ND	µg/L															
	Pentachlorophenol	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L										
	Phenanthrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L										
	Phenol	1.66	µg/L	1.02	µg/L	ND	µg/L	2.00	µg/L	3.63	µg/L	4.16	µg/L	5.17	µg/L	ND	µg/L	5.98	µg/L	5.28	µg/L	4.20	µg/L	2.60	µg/L
	Pyrene	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Acrolein	ND	µg/L					ND	µg/L							ND	µg/L								
	Acrylonitrile	ND	µg/L					ND	µg/L							ND	µg/L								
	Alpha-BHC	ND	µg/L													ND	µg/L								
	Benzene	ND	µg/L					ND	µg/L							ND	µg/L								
	Beta-BHC	ND	µg/L													ND	µg/L								
	Bis (2-Chloroethoxy) Methane	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Chloroethyl) Ether	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L	ND	µg/L
	Bis (2-Ethylhexyl) Phthalate	5.79	µg/L	4.16	µg/L	7.29	µg/L	4.21	µg/L	5.78	µg/L	4.95	µg/L	3.40	µg/L	3.12	µg/L	4.06	µg/L	2.52	µg/L	12.8	µg/L	3.70	µg/L
	Bromodichloromethane	ND	µg/L					ND	µg/L							ND	µg/L								
	Bromoform	ND	µg/L					ND	µg/L							ND	µg/L								
	Bromomethane	ND	µg/L					ND	µg/L							ND	µg/L								
	Carbon Tetrachloride	ND	µg/L					ND	µg/L							ND	µg/L								
	Chlorobenzene	ND	µg/L					ND	µg/L							ND	µg/L								
	Chloroethane	ND	µg/L					ND	µg/L							ND	µg/L								
	Chloroform	2.46	µg/L					2.32	µg/L					5.67	µg/L					2.53	µg/L				
	cis-1,3-Dichloropropene	ND	µg/L					ND	µg/L							ND	µg/L								
Delta-BHC	ND	µg/L													ND	µg/L									
Dibromochloromethane	ND	µg/L					ND	µg/L							ND	µg/L									
Ethylbenzene	ND	µg/L					ND	µg/L							ND	µg/L									
Gamma-BHC	ND	µg/L													ND	µg/L									
Methylene Chloride	ND	µg/L					ND	µg/L									8.80	µg/L							

APPENDIX B
PRIORITY POLLUTANT ANALYSES RESULTS, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Monitoring Location	Name	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
INF-002	N-Nitrosodipropylamine	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L
	N-Nitrosodimethylamine	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L
	N-Nitrosodiphenylamine	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L
	4,4'-DDD	ND µg/L						ND µg/L					
	4,4'-DDE	ND µg/L						ND µg/L					
	4,4'-DDT	ND µg/L						ND µg/L					
	Tetrachloroethene	ND µg/L			ND µg/L			7.95 µg/L				ND µg/L	
	Toluene	1.24 µg/L			1.41 µg/L			1.92 µg/L				ND µg/L	
	trans-1,2-Dichloroethene	ND µg/L			ND µg/L			ND µg/L				ND µg/L	
	trans-1,3-Dichloropropene	ND µg/L			ND µg/L			ND µg/L				ND µg/L	
	Trichloroethene	ND µg/L			ND µg/L			ND µg/L				ND µg/L	
	Vinyl Chloride	ND µg/L			ND µg/L			ND µg/L				ND µg/L	
	2,3,7,8-tetrachlorodibenzo-p-dioxin				ND pg/L			ND pg/L				ND pg/L	
	Lead	2.58 µg/L	1.94 µg/L	1.79 µg/L	2.18 µg/L	2.08 µg/L	1.49 µg/L	1.97 µg/L	1.98 µg/L	1.97 µg/L	2.94 µg/L	1.95 µg/L	1.78 µg/L
	Antimony	1.07 µg/L	0.800 µg/L	0.870 µg/L	1.18 µg/L	0.980 µg/L	0.910 µg/L	1.02 µg/L	0.970 µg/L	1.09 µg/L	1.49 µg/L	0.960 µg/L	1.17 µg/L
	Selenium	11.8 µg/L	12.2 µg/L	12.7 µg/L	11.8 µg/L	13.7 µg/L	11.4 µg/L	12.6 µg/L	12.8 µg/L	12.2 µg/L	9.43 µg/L	15.6 µg/L	15.1 µg/L
	Thallium	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L	ND µg/L
Zinc	135 µg/L	117 µg/L	128 µg/L	137 µg/L	124 µg/L	108 µg/L	130 µg/L	114 µg/L	144 µg/L	124 µg/L	112 µg/L	112 µg/L	

Notes:
 ND non-detect
 µg/L microgram per liter
 ng/L nanograms per liter
 pg/L picograms per liter

Appendix C. Priority Pollutants

APPENDIX C
PRIORITY POLLUTANTS LIST
 ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Elements

Antimony
 Arsenic
 Beryllium
 Cadmium
 Chromium
 Copper
 Lead
 Mercury
 Nickel
 Selenium
 Silver
 Thallium
 Zinc

Other Constituents

Asbestos
 Cyanide

Pesticides and PCBs
(EPA Method 608)

Aldrin
 Alpha-BHC
 Beta-BHC
 Delta-BHC
 Gamma-BHC
 Chlordane
 4,4'-DDD
 4,4'-DDE
 4,4'-DDT
 Dieldrin
 Endosulfan I
 Endosulfan II
 Endosulfan Sulfate
 Endrin
 Endrin Aldehyde
 Heptachlor
 Heptachlor Epoxide
 PCB-1016
 PCB-1221
 PCB-1232
 PCB-1242
 PCB-1248
 PCB-1254
 PCB-1260
 Toxaphene

Purgeable Organic Compounds
(EPA Method 624)

Acrolein
 Acrylonitrile
 Benzene
 Bromomethane
 Bromodichloromethane
 Bromoform
 Carbon Tetrachloride
 Chlorobenzene
 2-Chlorovinylether
 Chloroform
 Chloromethane
 Dibromochloromethane
 1,1-Dichloroethane
 1,2-Dichloroethane
 1,1-Dichloroethene
 Trans-1,2-Dichloroethene
 1,2-Dichloropropane
 Cis-1,3-Dichloropropene
 Trans-1,3-Dichloropropene
 Ethylbenzene
 Methylene Chloride
 1,1,2,2-Tetrachloroethane
 Tetrachloroethene
 1,1,1-Trichloroethane
 1,1,2-Trichloroethane
 Trichloroethene
 Toluene
 Vinyl Chloride

Base/Neutral Extractable Organic
Compounds
(EPA Method 625)

Acenaphthene
 Acenaphthylene
 Benzidene
 Benzo (a) Anthracene
 Benzo (b) Fluoranthene
 Benzo (k) Fluoranthene
 Benzo (a) Pyrene
 Benzo (g,h,i) Perylene
 Bis (2-Chloroethyl) Ether
 Bis (2-Chloroethoxy) Methane
 Bis (2-Ethylhexyl) Phthalate
 Bis (dichloroisopropyl) Ether
 4-Bromophenyl-Phenyl Ether
 Butyl Benzyl Phthalate

Base/Neutral Extractable Organic
Compounds (Continued)

2-Chloronaphthalene
 4-Chlorophenyl-phenyl Ether
 Chrysene
 Dibenzo (a,h) Anthracene
 Di-N-Butyl Phthalate
 1,3-Dichlorobenzene
 1,4-Dichlorobenzene
 1,2-Dichlorobenzene
 3,3-Dichlorobenzidine
 Diethylphthalate
 Dimethylphthalate
 2,4-Dinitrotoluene
 2,6-Dinitrotoluene
 Di-N-Octyl Phthalate
 1,2-Diphenylhydrazine
 Fluoranthene
 Fluorene
 Hexachlorobenzene
 Hexachlorobutadiene
 Hexachloroethane
 Hexachlorocyclopentadiene
 Indeno (1,2,3-cd) Pyrene
 Isophorone
 Naphthalene
 Nitrobenzene
 N-Nitrosodimethylamine
 N-Nitrosodipropylamine
 N-Nitrosodiphenylamine
 Phenanthrene
 Pyrene
 2,3,7,8-Tetrachlorodibenzo-P-Dioxin
 1,2,4-Trichlorobenzene

Acid Extractable Organic
Compounds
(EPA Method 625)

4-Chloro-3-Methylphenol
 2-Chlorophenol
 2,4-Dichlorophenol
 2,4-Dimethylphenol
 2,4-Dinitrophenol
 2-Methyl-4,6-Dinitrophenol
 2-Nitrophenol
 4-Nitrophenol
 Pentachlorophenol
 Phenol
 2,4,6-Trichlorophenol

Appendix D. Fees/Penalties for Noncompliance

APPENDIX D
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Issue Date	Amount	Item	Enforcement ID
Advance-Tech Plating, Inc.	10/14/2021	725	Notice of Violation	2021-00045765
Advance-Tech Plating, Inc.	5/3/2022	725	Notice of Violation	2022-00049146
Advance-Tech Plating, Inc.	6/28/2022	775	Notice of Violation	2022-00050152
Air Industries Company, A PCC Company (Knott)	11/23/2021	400	Notice of Violation	2021-00046366
Alloy Die Casting, Co. dba ADC Aerospace	9/16/2021	725	Notice of Violation	2021-00045375
Alloy Die Casting, Co. dba ADC Aerospace	11/2/2021	400	Notice of Violation	2021-00046051
Alloy Tech Electropolishing, Inc.	8/3/2021	525	Notice of Violation	2021-00044759
Alloy Tech Electropolishing, Inc.	11/30/2021	525	Notice of Violation	2021-00046347
Amerimax Building Products, Inc.	11/2/2021	675	Notice of Violation	2021-00045775
Andres Technical Plating	9/30/2021	775	Notice of Violation	2021-00045605
AnoChem Coatings	9/30/2021	200	Notice of Violation	2021-00045584
Anomil Ent. Db a Danco Metal Surfacing	5/17/2022	725	Notice of Violation	2022-00049400
APCT Orange County	2/24/2022	525	Notice of Violation	2022-00047944
ARO Service	1/11/2022	807	Notice of Violation	2022-00047339
Arrowhead Products Corporation	3/15/2022	400	Notice of Violation	2022-00048323
Arrowhead Products Corporation	3/24/2022	724	Notice of Violation	2022-00048361
Arrowhead Products Corporation	4/19/2022	675	Notice of Violation	2022-00048344
Arrowhead Products Corporation	6/28/2022	675	Notice of Violation	2022-00049625
Astech Engineered Products (1)	6/28/2022	857	Notice of Violation	2022-00049921
Auto-Chlor System of Washington, Inc.	11/16/2021	525	Notice of Violation	2021-00046303
Aviation Equipment Processing	1/20/2022	400	Notice of Violation	2022-00047433
Avid Bioservices, Inc.	1/27/2022	675	Notice of Violation	2022-00047662
Avid Bioservices, Inc.	3/31/2022	400	Notice of Violation	2022-00048662
Avid Bioservices, Inc.	3/31/2022	400	Notice of Violation	2022-00048663
Beverage Visions LLC (Anaheim)	6/23/2022	707	Notice of Violation	2022-00049944
Beverage Visions LLC (Yorba Linda)	1/11/2022	507	Notice of Violation	2022-00047341
Brasstech, Inc	1/27/2022	725	Notice of Violation	2022-00047650
Brasstech, Inc	3/17/2022	400	Notice of Violation	2022-00048271
Brasstech, Inc	6/16/2022	525	Notice of Violation	2022-00048909
Brothers International Desserts (West)	4/26/2022	707	Notice of Violation	2022-00049071
CD Video, Inc.	11/30/2021	400	Notice of Violation	2021-00046607
Chromadora, Inc.	3/10/2022	725	Notice of Violation	2022-00048305
Circuit Technology, Inc.	11/16/2021	757	Notice of Violation	2021-00046304
City of Tustin - Maintenance Yard	9/23/2021	400	Notice of Violation	2021-00045423
Coast to Coast Circuits, Inc.	10/28/2021	400	Notice of Violation	2021-00046053

APPENDIX D
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Issue Date	Amount	Item	Enforcement ID
Coastline High Performance Coatings, LTD	7/13/2021	1000	Compliance Requirement Letter	2021-00043740
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	3/17/2022	507	Notice of Violation	2022-00048334
Coastline Metal Finishing Corp., A Division of Valence Surface Technologies	4/19/2022	400	Notice of Violation	2022-00048852
Dr. Smoothie Enterprises - DBA Bevolution Group	2/3/2022	507	Notice of Violation	2022-00047743
Dunham Metal Plating Inc.	11/2/2021	725	Notice of Violation	2021-00046084
Dunham Metal Plating Inc.	12/7/2021	400	Notice of Violation	2021-00046755
Dunham Metal Plating Inc.	12/7/2021	400	Notice of Violation	2021-00046756
Eco Pure LLC	1/11/2022	507	Notice of Violation	2022-00047343
EFT Fast Quality Service, Inc.	11/30/2021	725	Notice of Violation	2021-00046348
Electrode Technologies, Inc. dba Reid Metal Finishing	10/14/2021	725	Notice of Violation	2021-00045756
Electrode Technologies, Inc. dba Reid Metal Finishing	12/21/2021	200	Notice of Violation	2021-00046880
Electrolurgy, Inc.	9/30/2021	725	Notice of Violation	2021-00045565
Embee Processing (Anodize)	12/21/2021	675	Notice of Violation	2021-00046886
Gemini Industries, Inc.	7/20/2021	507	Notice of Violation	2021-00044479
Goodwin Company	6/16/2022	400	Notice of Violation	2022-00049858
Hartwell Corporation	8/9/2021	756	Notice of Violation	2021-00044897
Hightower Plating & Manufacturing Co.	1/11/2022	525	Notice of Violation	2022-00047348
House Foods America Corporation (East)	8/31/2021	507	Notice of Violation	2021-00045182
House Foods America Corporation (East)	2/17/2022	507	Notice of Violation	2022-00047838
House Foods America Corporation (West)	2/17/2022	507	Notice of Violation	2022-00047840
Howmet Global Fastening Systems Inc.	9/16/2021	707	Notice of Violation	2021-00045379
Ikon Powder Coating, Inc.	2/3/2022	725	Notice of Violation	2022-00047736
LGM Subsidiary Holdings LLC	10/28/2021	200	Notice of Violation	2021-00046062
Linco Industries, Inc.	10/14/2021	475	Notice of Violation	2021-00045766
Linco Industries, Inc.	11/23/2021	857	Notice of Violation	2021-00046369
Logi Graphics, Inc.	12/28/2021	200	Notice of Violation	2021-00047126
Maruchan, Inc. (Deere)	2/3/2022	507	Notice of Violation	2022-00047667
Meggitt (Orange County), Inc.	2/10/2022	200	Notice of Violation	2022-00047888
Orange County Chemical Supply, Inc.	11/30/2021	756	Notice of Violation	2021-00046349
Pacific Western Container	8/3/2021	525	Notice of Violation	2021-00044760

APPENDIX D
FEES AND PENALTIES FOR NONCOMPLIANCES, FISCAL YEAR 2021/22
ORANGE COUNTY SANITATION DISTRICT, RESOURCE PROTECTION DIVISION

Facility	Issue Date	Amount	Item	Enforcement ID
Performance Powder, Inc.	7/13/2021	400	Notice of Violation	2021-00044417
Performance Powder, Inc.	8/3/2021	400	Notice of Violation	2021-00044756
Powdercoat Services, LLC (Bldg J / Plant 3)	7/6/2021	725	Notice of Violation	2021-00044122
Prima-Tex Industries Inc.	1/27/2022	525	Notice of Violation	2022-00047653
RBC Transport Dynamics Corp.	12/21/2021	675	Notice of Violation	2021-00046887
RBC Transport Dynamics Corp.	1/25/2022	400	Notice of Violation	2022-00047466
RBC Transport Dynamics Corp.	3/1/2022	400	Notice of Violation	2022-00048107
Rigiflex Technology, Inc.	7/20/2021	525	Notice of Violation	2021-00044480
Sanitor Corporation	3/3/2022	756	Notice of Violation	2022-00048175
Serrano Water District	4/26/2022	825	Notice of Violation	2022-00049072
Serrano Water District	4/26/2022	825	Notice of Violation	2022-00049074
Speedy Metals, Inc. DBA Pacific Metal Cutting	2/24/2022	756	Notice of Violation	2022-00047943
Star Manufacturing LLC, dba Commercial Metal Forming	5/12/2022	556	Notice of Violation	2022-00049348
Statek Corporation (Main)	9/30/2021	707	Notice of Violation	2021-00045612
Statek Corporation (Main)	12/21/2021	707	Notice of Violation	2021-00046888
Statek Corporation (Main)	3/3/2022	707	Notice of Violation	2022-00048176
Statek Corporation (Orange Grove)	3/24/2022	707	Notice of Violation	2022-00048369
Stepan Company	8/31/2021	1030	Notice of Violation	2021-00045183
Summit Interconnect, Inc.	9/16/2021	525	Notice of Violation	2021-00045383
Summit Interconnect, Inc.	9/23/2021	400	Notice of Violation	2021-00045414
Summit Interconnect, Inc.	11/30/2021	400	Notice of Violation	2021-00046592
Superior Plating	6/16/2022	725	Notice of Violation	2022-00049862
T.A.C. West, Inc.	11/23/2021	707	Notice of Violation	2021-00046376
T.A.C. West, Inc.	12/21/2021	200	Notice of Violation	2021-00046889
TTM Technologies North America, LLC. (Coronado)	11/23/2021	725	Notice of Violation	2021-00046371
Winonics (Brea)	11/2/2021	725	Notice of Violation	2021-00046064
Winonics, Inc.	12/9/2021	725	Notice of Violation	2021-00046816
Winonics, Inc.	4/12/2022	725	Notice of Violation	2022-00048810
Winonics, Inc.	6/23/2022	400	Notice of Violation	2022-00049661

Appendix E. Public Notice of Significantly Noncompliant
Industries

AFFIDAVIT OF PUBLICATION
STATE OF CALIFORNIA,)

) ss.

County of Orange)

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of **The Orange County Register**, a newspaper of general circulation, published in the city of Santa Ana, County of Orange, and which news-paper has been adjudged to be a newspaper of general circulation by the Superior Court of the County of Orange, State of California, under the date of November 19, 1905, Case No. A-21046, that the notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

October 27, 2022

"I certify (or declare) under the penalty of perjury under the laws of the State of California that the foregoing is true and correct":

Executed at Santa Ana, Orange County, California, on

Date: October 27, 2022



The Orange County Register
1771 S. Lewis St.
Anaheim, CA 92805

PROOF OF PUBLICATION

PUBLIC NOTICE

In accordance with the public participation requirements of 40 CFR Part 25 in the enforcement of National Pretreatment Standards and as defined by 40 CFR 402.8(f)(2)(viii), the Orange County Sanitation District (OC San) is hereby publishing the following list of permittees who, during July 1, 2021 through June 30, 2022, were identified as industries in significant noncompliance with wastewater discharge standards. An industry in significant noncompliance is defined as follows:

- Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits.
- Technical Review Criteria (TRC) violations, also known as acute violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, multiplied by the applicable TRC (TRC = 1.4 for BOD₅, TSS, TSS, oil, and grease, and 1.2 for all other pollutants except pH).
- Any other violation of a Pretreatment Standard or Requirement (daily maximum, long-term average, instantaneous limits, or narrative standard) that the POTW (Publicly Owned Treatment Works, which in this case is OC San) determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public).
- Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
- Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.
- Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.
- Failure to accurately report noncompliance.
- Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment Program.

OC San has taken enforcement action against these permittees. In response, permittees are required to identify and implement corrective actions to maintain long-term compliance with wastewater discharge regulation and permit limits.

Company Name	Permit No.	Category	City
Industries SNC Due to Discharge Violations			
Embee Processing (Anodize)	1-600456	Electroplating, Metal Finishing	Santa Ana
Hartwell Corporation	1-021381	OC San Local Limits	Placentia
Linco Industries, Inc.	1-021253	Metal Finishing	Anaheim
Sanitor Corporation	1-601267	Pharmaceutical Manufacturing, Soap & Detergent Manufacturing	Stanton
Industries SNC Due to Reporting Violations			
Alliance Medical Products, Inc.	1-541182	Pharmaceutical Manufacturing	Irvine
Allied International	1-031107	Soap And Detergent Manufacturing	Buena Park
Andres Technical Plating	1-521798	Metal Finishing	Placentia
Avid Bioservices, Inc.	1-571332	Pharmaceutical Manufacturing	Tustin
Blue Ribbon Container and Display, Inc.	1-601468	OC San Local Limits	Buena Park
City of Anaheim - Public Utilities Dept	1-021073	OC San Local Limits	Anaheim
Cooper and Brain, Inc.	1-031070	Oil and Gas Extraction	Brea
Data Aire, Inc. #2	1-021379	Metal Finishing	Orange
Excello Circuits, Inc. (Hunter)	1-601356	Metal Finishing	Anaheim
FMH Aerospace Corp.	1-600585	Aluminum Forming, Metal Finishing, Nonferrous Metals Forming & Metal Powders	Irvine
Kraft Heinz Company	1-071056	OC San Local Limits	Irvine
Logi Graphics, Inc.	1-031049	Metal Finishing	Huntington Beach
Meggitt (Orange County), Inc.	1-601115	Metal Finishing	Irvine
Merical, LLC	1-600655	Pharmaceutical Manufacturing	Orange
O'Donnell Oil Company, LLC	1-581191	OC San Local Limits	Huntington Beach
Only Cremations for Pets (Stanton)	1-601085	OC San Local Limits	Stanton
Power Distribution, Inc.	1-511400	OC San Local Limits	Santa Ana
Quality Aluminum Forge, LLC (Cypress North)	1-521833	Aluminum Forming	Orange
Quality Aluminum Forge, LLC (Cypress South)	1-600272	Aluminum Forming	Orange
Thompson Energy Resources, LLC (Brea)	1-601469	OC San Local Limits	Brea
Vi-Cal Metals, Inc.	1-521846	OC San Local Limits	Anaheim
Industries SNC Due to Discharge and Reporting Violations			
Amerimax Building Products, Inc.	1-021102	Coil Coating	Anaheim
Performance Powder, Inc.	1-521805	Metal Finishing	Anaheim

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Appendix F. Acknowledgements

APPENDIX F

ACKNOWLEDGEMENTS

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Appendix G. Irvine Ranch Water District (IRWD) Sampling

APPENDIX G

2021/22 Irvine Ranch Water District (IRWD) Quarterly Priority Pollutant Monitoring

Sampling is performed quarterly by Regulatory Compliance personnel on the influent, effluent, and sludge. The results for MWRP influent, effluent, and sludge are shown in this appendix. Two types of sampling are performed:

1. Grab samples are collected at each location for Volatile Organic Priority Pollutants and cyanide.
2. Composite samples are collected for Base/Neutrals and Acid Extractables, Inorganic Priority Pollutants, Pesticides/Polychlorinated Biphenyls at each location. This sampling is performed with an automatic sampler that collects discrete, flow-paced samples over a 24-hour period. The composite samples are collected in 5-gallon glass bottles, and then distributed out into the appropriate glass or plastic bottle for preservation and storage.

The collection points for the samples are as follows:

- Influent: Collected at headworks before grit basins.
- Effluent: Collected at the end of the chlorine contact basin (CCB) but downstream of where the CCB effluent and ultraviolet (UV) disinfected effluent are combined, just prior to entering the recycled water distribution system.
- Sludge: Collected at the flow meter vault on the MPS-3 force main.

Samples are submitted to the IRWD Water Quality Laboratory where they are analyzed in-house or contracted to either Weck Laboratories located in the City of Industry, or Eurofins Test America Laboratory located in the City of Irvine. Collected samples are preserved, refrigerated, and shipped on ice as required to the specific lab for analysis. Each lab supplies their respective sample containers with the preservatives as required by the method.

The detection limits shown in the results are the limits for that particular sample. The detection limit may vary from the laboratory and from sample to sample based on QA/QC analysis and the degree of sample dilution.

APPENDIX G
SUMMARY OF INORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, EFFLUENT AND SLUDGE, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/8/21	10/06/21-12/07/21	1/11/22-3/03/22	4/5/22-6/07/22	2021-2022	2020-2021	
INFLUENT							
Antimony	0.41	0.54	0.44	0.51	0.48	ND	0.50
Arsenic	2.76	2.60	2.24	2.33	2.48	2.46	1.00
Beryllium	ND	ND	ND	ND	ND	ND	0.50
Cadmium	0.12	0.10	0.11	0.12	0.11	ND	0.25
Chromium	0.96	1.14	1.29	1.48	1.22	1.39	0.50
Copper	50.80	75.00	37.00	42.60	51.35	47.95	0.50
Lead	0.48	0.73	0.57	0.81	0.65	0.69	0.50
Mercury	0.01	0.01	0.02	0.02	0.02	0.01	0.01
Nickel	2.55	2.90	2.72	3.44	2.90	3.01	0.50
Selenium	2.29	2.19	1.81	2.47	2.19	1.94	0.50
Silver	0.18	0.31	0.20	0.24	0.23	0.22	0.25
Thallium	ND	ND	ND	ND	ND	ND	1.00
Total Cyanide	17.00	25.00	11.00	15.00	17.00	50.50	5.00
Zinc	111.00	127.00	136.00	137.00	127.75	122.75	0.50
EFFLUENT							
Antimony	0.40	0.41	0.38	0.43	0.41	ND	0.50
Arsenic	2.11	2.02	2.01	1.69	1.96	1.81	1.00
Beryllium	ND	ND	ND	ND	ND	ND	0.50
Cadmium	ND	0.02	ND	0.02	0.01	ND	0.25
Chromium	1.13	0.72	0.43	0.39	0.67	ND	0.50
Copper	4.43	4.62	4.38	4.12	4.39	5.53	0.50
Lead	0.14	0.12	ND	ND	0.06	ND	0.50
Mercury	ND	ND	ND	ND	0.00	ND	0.01
Nickel	2.47	2.06	1.91	1.96	2.10	2.03	0.50
Selenium	1.15	1.24	1.66	1.56	1.40	1.24	0.50
Silver	ND	ND	ND	ND	ND	ND	0.25
Thallium	ND	ND	ND	ND	ND	ND	1.00
Total Cyanide	ND	ND	ND	ND	ND	ND	5.00
Zinc	65.83	63.87	55.30	51.10	59.03	74.90	0.50
SLUDGE							
Antimony	3.40	NA	NA	NA	3.40	ND	10.00
Arsenic	9.71	NA	NA	NA	9.71	9.93	20.00
Beryllium	ND	NA	NA	NA	ND	ND	10.00
Cadmium	1.92	NA	NA	NA	1.92	ND	5.00
Chromium	195.33	NA	NA	NA	195.33	20.23	10.00
Copper	1310.53	NA	NA	NA	1310.53	3305.00	10.00
Lead	15.41	NA	NA	NA	15.41	63.15	10.00

APPENDIX G
SUMMARY OF INORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, EFFLUENT AND SLUDGE, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)

(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21- 9/8/21	10/06/21- 12/07/21	1/11/22- 3/03/22	4/5/22- 6/07/22	2021-2022	2020-2021	
Mercury	0.28	NA	NA	NA	0.28	0.66	0.01
Nickel	136.77	NA	NA	NA	136.77	45.68	10.00
Selenium	8.81	NA	NA	NA	8.81	19.43	10.00
Silver	4.35	NA	NA	NA	4.35	4.77	5.00
Thallium	ND	NA	NA	NA	ND	ND	20.00
Total Cyanide	ND	NA	NA	NA	ND	ND	100.00
Zinc	1619.40	NA	NA	NA	1619.40	1872.50	10.00

ML method limit
 ND non-detect
 NA not analyzed
 µg/L microgram per liter
 * estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/07/21	1/11/22-3/03/22	4/05/22-6/07/22	2021-2022	2020-2021	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.50
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Acrolein	ND	ND	ND	ND	ND	ND	5.00
Acrylonitrile	ND	ND	ND	ND	ND	ND	2.00
Benzene	ND	ND	ND	ND	ND	ND	0.50
Bromodichloromethane	0.22	0.26	0.25	0.41	0.29	ND	0.50
Bromoform	ND	ND	0.24	0.27	0.13	ND	0.50
Bromomethane	ND	ND	ND	ND	ND	ND	0.50
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.50
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Chloroethane	ND	ND	ND	ND	ND	ND	0.50
Chloroform	1.16	1.00	0.79	1.16	1.03	1.01	0.50
Chloromethane	ND	ND	ND	ND	ND	ND	0.50
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Dibromochloromethane	0.21	0.33	0.39	0.42	0.34	ND	0.50
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.50
Methylene chloride	ND	ND	0.23	0.23	0.12	ND	2.00
Tetrachloroethene	ND	ND	ND	ND	ND	ND	0.50
Toluene	0.31	0.46	0.78	0.99	0.64	0.66	0.50
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
trans-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Trichloroethylene	ND	ND	ND	0.15	0.04	ND	0.50
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.50
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.50
VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES							
2-Hexanone	ND	ND	ND	ND	ND	ND	10.00
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10.00
Acetone	364.00	175.00	258.00	89.70	221.68	114.33	2.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/07/21	1/11/22-3/03/22	4/05/22-6/07/22	2021-2022	2020-2021	
Carbon disulfide	1.97	0.42	ND	ND	0.60	ND	1.00
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.50
Methyl ethyl ketone	ND	2.57	2.21	1.69	1.62	1.22	2.00
o-Xylene	ND	ND	ND	ND	ND	ND	0.50
Styrene	ND	0.43	0.82	0.43	0.42	ND	0.50
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10.00
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	10.00
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	5.00
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10.00
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	10.00
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	10.00
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	25.00
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	10.00
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	10.00
Acenaphthene	ND	ND	ND	ND	ND	ND	5.00
Acenaphthylene	ND	ND	ND	ND	ND	ND	10.00
Anthracene	ND	ND	ND	ND	ND	ND	10.00
Benzidine	ND	ND	ND	ND	ND	ND	25.00
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	10.00
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	10.00
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	10.00
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	20.00
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	10.00
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	10.00
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	5.00
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	10.00
Bis(2-Ethylhexyl) phthalate	ND	ND	ND	ND	ND	ND	25.00
Butyl benzyl phthalate	ND	6.1	ND	ND	1.53	ND	10.00
Chrysene	ND	ND	ND	ND	ND	ND	10.00
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	20.00
Diethyl phthalate	ND	ND	ND	ND	ND	ND	10.00
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	10.00
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	10.00
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	10.00
Fluoranthene	ND	ND	ND	ND	ND	ND	5.00
Fluorene	ND	ND	ND	ND	ND	ND	10.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/07/21	1/11/22-3/03/22	4/05/22-6/07/22	2021-2022	2020-2021	
Hexachlorobenzene	8.14	ND	ND	ND	2.04	ND	5.00
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	5.00
Hexachlorocyclopentadiene	ND	ND	ND	ND	ND	ND	25.00
Hexachloroethane	ND	ND	ND	ND	ND	ND	5.00
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	20.00
Isophorone	ND	ND	ND	ND	ND	ND	5.00
Naphthalene	ND	ND	ND	ND	ND	ND	5.00
Nitrobenzene	ND	ND	ND	ND	ND	ND	5.00
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	10.00
N-Nitrosodi-n-propylamine	ND	ND	ND	ND	ND	ND	10.00
N-Nitrosodiphenylamine	ND	ND	ND	ND	ND	ND	5.00
Phenanthrene	ND	ND	ND	ND	ND	ND	10.00
Pyrene	ND	ND	ND	ND	ND	ND	10.00
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	10.00
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	25.00
2-Chlorophenol	ND	ND	ND	ND	ND	ND	10.00
2-Nitrophenol	ND	ND	ND	ND	ND	ND	10.00
4,6-Dinitro-o-cresol	ND	ND	ND	ND	ND	ND	25.00
4-Nitrophenol	ND	ND	ND	ND	ND	ND	50.00
p-Chloro-m-cresol	ND	ND	ND	ND	ND	ND	5.00
Pentachlorophenol	ND	ND	ND	ND	ND	ND	10.00
Phenol	5.39	11.00	11.00	ND	6.85	7.57	5.00
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	NA	NA	NA	ND	ND	25.00
2-Methylnaphthalene	NA	NA	ND	ND	ND	NA	0.00
2-Methylphenol	ND	NA	ND	ND	ND	ND	25.00
2-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
3-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
4-Chloroaniline	NA	NA	NA	NA	NA	NA	0.00
3&4-Methylphenol	26.50	NA	NA	NA	26.50	17.53	5.00
4-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
Aniline	NA	NA	NA	NA	NA	NA	0.00
Benzoic acid	NA	NA	ND	ND	ND	NA	0.00
Benzyl alcohol	NA	NA	30.00	25.00	27.50	NA	0.00
Dibenzofuran	NA	NA	ND	ND	ND	NA	0.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
INFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/07/21	1/11/22-3/03/22	4/05/22-6/07/22	2021-2022	2020-2021	
PRIORITY POLLUTANT PESTICIDES							
4,4'-DDD	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDE	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.01
Aldrin	ND	ND	ND	ND	ND	ND	0.01
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.01
Beta-BHC	ND	ND	ND	ND	ND	ND	0.01
Chlordane	ND	ND	ND	ND	ND	ND	0.50
Delta-BHC	ND	ND	ND	ND	ND	ND	0.01
Dieldrin	ND	ND	ND	ND	ND	ND	0.02
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	0.03
Endosulfan-I	ND	ND	ND	ND	ND	ND	0.02
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.01
Endrin	ND	ND	ND	ND	ND	ND	0.02
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.01
Heptachlor	ND	ND	ND	ND	ND	ND	0.02
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.01
Lindane	ND	ND	ND	ND	ND	ND	0.02
Methoxychlor	ND	ND	NA	NA	ND	NA	0.03
PCB-1016	ND	ND	ND	ND	ND	ND	1.50
PCB-1221	ND	ND	ND	ND	ND	ND	1.50
PCB-1232	ND	ND	ND	ND	ND	ND	1.50
PCB-1242	ND	ND	ND	ND	ND	ND	1.50
PCB-1248	ND	ND	ND	ND	ND	ND	1.50
PCB-1254	ND	ND	ND	ND	ND	ND	1.50
PCB-1260	ND	ND	ND	ND	ND	ND	1.50
Toxaphene	ND	ND	ND	ND	ND	ND	2.50

ML method limit
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/7/21	1/11/22-3/03/22	4/5/22-6/07/22	2021-2022	2020-2021	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1,2-Trichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,1-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloroethane	ND	ND	ND	ND	ND	ND	0.50
1,2-Dichloropropane	ND	ND	ND	ND	ND	ND	0.50
1,3-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
1,4-Dichlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Acrolein	ND	ND	ND	ND	ND	ND	5.00
Acrylonitrile	ND	ND	ND	ND	ND	ND	2.00
Benzene	ND	ND	ND	ND	ND	ND	0.50
Bromodichloromethane	24.40	24.97	23.28	19.27	23.00	21.75	0.50
Bromoform	0.38	0.47	0.45	0.38	0.42	0.09	0.50
Bromomethane	ND	ND	0.11	ND	0.04	ND	0.50
Carbon tetrachloride	ND	ND	ND	ND	ND	ND	0.50
Chlorobenzene	ND	ND	ND	ND	ND	ND	0.50
Chloroethane	ND	ND	ND	ND	ND	ND	0.50
Chloroform	72.60	95.30	101.10	91.10	92.24	66.30	0.50
Chloromethane	ND	ND	0.24	0.22	0.14	ND	0.50
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
cis-1,3-Dichloropropene	ND	ND	ND	ND	ND	ND	0.50
Dibromochloromethane	6.63	8.31	8.68	ND	6.46	6.19	0.50
Ethylbenzene	ND	ND	ND	ND	ND	ND	0.50
Methylene chloride	ND	ND	ND	ND	ND	1.20	2.00
Tetrachloroethene	ND	ND	0.19	ND	0.07	ND	0.50
Toluene	ND	ND	0.22	ND	0.09	ND	0.50
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	0.50
trans-1,3-Dichloropropene	ND	ND	0.26	ND	0.10	ND	0.50
Trichloroethylene	ND	ND	ND	ND	ND	ND	0.50
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	0.50
Vinyl chloride	ND	ND	ND	ND	ND	ND	0.50
VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES							
2-Hexanone	ND	ND	ND	ND	ND	ND	10.00
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	10.00
Acetone	3.21	2.49	2.45	2.97	2.71	0.54	2.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/7/21	1/11/22-3/03/22	4/5/22-6/07/22	2021-2022	2020-2021	
Carbon disulfide	ND	ND	ND	ND	ND	ND	1.00
m+p-Xylenes	ND	ND	ND	ND	ND	ND	0.50
Methyl ethyl ketone	ND	ND	ND	ND	ND	ND	2.00
o-Xylene	ND	ND	ND	ND	ND	ND	0.50
Styrene	ND	ND	ND	ND	ND	ND	0.50
Tetrahydrofuran	ND	ND	ND	ND	ND	ND	10.00
Vinyl acetate	ND	ND	ND	ND	ND	ND	0.05
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	ND	ND	ND	ND	ND	2.00
1,2-Diphenylhydrazine	ND	ND	ND	ND	ND	ND	1.00
2,4-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2.00
2,6-Dinitrotoluene	ND	ND	ND	ND	ND	ND	2.00
2-Chloronaphthalene	ND	ND	ND	ND	ND	ND	2.00
3,3'-Dichlorobenzidine	ND	ND	ND	ND	ND	ND	5.00
4-Bromophenyl phenyl	ND	ND	ND	ND	ND	ND	2.00
4-Chlorophenyl phenyl ether	ND	ND	ND	ND	ND	ND	2.00
Acenaphthene	ND	ND	ND	ND	ND	ND	1.00
Acenaphthylene	ND	ND	ND	ND	ND	ND	2.00
Anthracene	ND	ND	ND	ND	ND	ND	2.00
Benzidine	ND	ND	ND	ND	ND	ND	5.00
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	2.00
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	2.00
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	2.00
Benzo(g,h,i)perylene	ND	ND	ND	ND	ND	ND	4.00
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	2.00
Bis(2-chloroethoxy)methane	ND	ND	ND	ND	ND	ND	2.00
Bis(2-Chloroethyl) ether	ND	ND	ND	ND	ND	ND	1.00
Bis(2-Chloroisopropyl) ether	ND	ND	ND	ND	ND	ND	2.00
Bis(2-Ethylhexyl) phthalate	ND	ND	ND	ND	ND	ND	5.00
Butyl benzyl phthalate	ND	0.54	ND	ND	0.14	ND	2.00
Chrysene	ND	ND	ND	ND	ND	ND	2.00
Dibenzo(a,h)anthracene	ND	ND	ND	ND	ND	ND	4.00
Diethyl phthalate	ND	ND	ND	ND	ND	ND	2.00
Dimethyl phthalate	ND	ND	ND	ND	ND	ND	2.00
Di-N-Butylphthalate	ND	ND	ND	ND	ND	ND	2.00
Di-N-Octylphthalate	ND	ND	ND	ND	ND	ND	2.00
Fluoranthene	ND	ND	ND	ND	ND	ND	1.00
Fluorene	ND	ND	ND	ND	ND	ND	2.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/7/21	1/11/22-3/03/22	4/5/22-6/07/22	2021-2022	2020-2021	
Hexachlorobenzene	ND	ND	ND	ND	ND	ND	1.00
Hexachlorobutadiene	ND	ND	ND	ND	ND	ND	1.00
Hexachlorocyclopentadiene	ND	0.46	ND	ND	0.12	ND	5.00
Hexachloroethane	ND	ND	ND	ND	ND	ND	1.00
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	4.00
Isophorone	ND	ND	ND	ND	ND	ND	1.00
Naphthalene	ND	ND	ND	ND	ND	ND	1.00
Nitrobenzene	ND	ND	ND	ND	ND	ND	1.00
N-Nitrosodimethylamine	ND	ND	ND	ND	ND	ND	2.00
N-Nitrosodi-n-propylamine	ND	ND	ND	ND	ND	ND	2.00
N-Nitrosodiphenylamine	ND	ND	ND	ND	ND	ND	1.00
Phenanthrene	ND	ND	ND	ND	ND	ND	2.00
Pyrene	ND	ND	ND	ND	ND	ND	2.00
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dichlorophenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dimethylphenol	ND	ND	ND	ND	ND	ND	2.00
2,4-Dinitrophenol	ND	ND	ND	ND	ND	ND	5.00
2-Chlorophenol	ND	ND	ND	ND	ND	ND	2.00
2-Nitrophenol	ND	ND	ND	ND	ND	ND	2.00
4,6-Dinitro-o-cresol	ND	ND	ND	ND	ND	ND	5.00
4-Nitrophenol	ND	ND	ND	ND	ND	ND	10.00
p-Chloro-m-cresol	ND	ND	ND	ND	ND	ND	1.00
Pentachlorophenol	ND	ND	ND	ND	ND	ND	2.00
Phenol	ND	ND	ND	ND	ND	ND	1.00
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	NA	NA	NA	ND	ND	5.00
2-Methylnaphthalene	NA	NA	ND	ND	ND	NA	0.00
2-Methylphenol	ND	NA	ND	ND	ND	ND	5.00
2-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
3-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
4-Chloroaniline	NA	NA	NA	NA	NA	NA	0.00
3&4-Methylphenol	NA	NA	NA	NA	NA	ND	1.00
4-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
Aniline	NA	NA	NA	NA	NA	NA	0.00
Benzoic acid	NA	NA	ND	ND	ND	NA	0.00
Benzyl alcohol	NA	NA	ND	ND	ND	NA	0.00
Dibenzofuran	NA	NA	ND	ND	ND	NA	0.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
FINAL EFFLUENT, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/20/21-9/08/21	10/06/21-12/7/21	1/11/22-3/03/22	4/5/22-6/07/22	2021-2022	2020-2021	
PRIORITY POLLUTANT PESTICIDES							
4,4'-DDD	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDE	ND	ND	ND	ND	ND	ND	0.03
4,4'-DDT	ND	ND	ND	ND	ND	ND	0.01
Aldrin	ND	ND	ND	ND	ND	ND	0.01
Alpha-BHC	ND	ND	ND	ND	ND	ND	0.01
Beta-BHC	ND	ND	ND	ND	ND	ND	0.01
Chlordane	ND	ND	ND	ND	ND	ND	0.50
Delta-BHC	ND	ND	ND	ND	ND	ND	0.01
Dieldrin	ND	ND	ND	ND	ND	ND	0.02
Endosulfan sulfate	ND	ND	ND	ND	ND	ND	0.03
Endosulfan-I	ND	ND	ND	ND	ND	ND	0.02
Endosulfan-II	ND	ND	ND	ND	ND	ND	0.01
Endrin	ND	ND	ND	ND	ND	ND	0.02
Endrin aldehyde	ND	ND	ND	ND	ND	ND	0.01
Heptachlor	ND	ND	ND	ND	ND	ND	0.02
Heptachlor epoxide	ND	ND	ND	ND	ND	ND	0.01
Lindane	ND	ND	ND	ND	ND	ND	0.02
Methoxychlor	ND	ND	NA	NA	ND	ND	0.03
PCB-1016	ND	ND	ND	ND	ND	ND	1.50
PCB-1221	ND	ND	ND	ND	ND	ND	1.50
PCB-1232	ND	ND	ND	ND	ND	ND	1.50
PCB-1242	ND	ND	ND	ND	ND	ND	1.50
PCB-1248	ND	ND	ND	ND	ND	ND	1.50
PCB-1254	ND	ND	ND	ND	ND	ND	1.50
PCB-1260	ND	ND	ND	ND	ND	ND	1.50
Toxaphene	ND	ND	ND	ND	ND	ND	2.50

ML method limit
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/21/2021				2021-2022	2020-2021	
VOLATILE PRIORITY POLLUTANTS							
1,1,1-Trichloroethane	ND	NA	NA	NA	ND	ND	12.50
1,1,2,2-Tetrachloroethane	ND	NA	NA	NA	ND	ND	12.50
1,1,2-Trichloroethane	ND	NA	NA	NA	ND	ND	12.50
1,1-Dichloroethane	ND	NA	NA	NA	ND	ND	12.50
1,1-Dichloroethene	ND	NA	NA	NA	ND	ND	12.50
1,2-Dichlorobenzene	ND	NA	NA	NA	ND	ND	12.50
1,2-Dichloroethane	ND	NA	NA	NA	ND	ND	12.50
1,2-Dichloropropane	ND	NA	NA	NA	ND	ND	12.50
1,3-Dichlorobenzene	ND	NA	NA	NA	ND	ND	12.50
1,4-Dichlorobenzene	ND	NA	NA	NA	ND	ND	12.50
Acrolein	ND	NA	NA	NA	ND	ND	125.00
Acrylonitrile	ND	NA	NA	NA	ND	ND	50.00
Benzene	ND	NA	NA	NA	ND	ND	12.50
Bromodichloromethane	ND	NA	NA	NA	ND	ND	12.50
Bromoform	ND	NA	NA	NA	ND	ND	12.50
Bromomethane	ND	NA	NA	NA	ND	ND	12.50
Carbon tetrachloride	ND	NA	NA	NA	ND	ND	12.50
Chlorobenzene	ND	NA	NA	NA	ND	ND	12.50
Chloroethane	ND	NA	NA	NA	ND	ND	12.50
Chloroform	ND	NA	NA	NA	ND	1.92	12.50
Chloromethane	ND	NA	NA	NA	ND	ND	12.50
cis-1,2-Dichloroethene	ND	NA	NA	NA	ND	ND	12.50
cis-1,3-Dichloropropene	ND	NA	NA	NA	ND	ND	12.50
Dibromochloromethane	ND	NA	NA	NA	ND	ND	12.50
Ethylbenzene	ND	NA	NA	NA	ND	ND	12.50
Methylene chloride	ND	NA	NA	NA	ND	ND	50.00
Tetrachloroethene	ND	NA	NA	NA	ND	ND	12.50
Toluene	15.80	NA	NA	NA	15.8	10.99	12.50
trans-1,2-Dichloroethene	ND	NA	NA	NA	ND	ND	12.50
trans-1,3-Dichloropropene	ND	NA	NA	NA	ND	ND	12.50
Trichloroethylene	ND	NA	NA	NA	ND	ND	12.50
Trichlorofluoromethane	ND	NA	NA	NA	ND	ND	12.50
Vinyl chloride	ND	NA	NA	NA	ND	ND	12.50
VOLATILE POLLUTANTS – HAZARDOUS SUBSTANCES							
2-Hexanone	ND	NA	NA	NA	ND	ND	250.00
4-Methyl-2-pentanone	ND	NA	NA	NA	ND	ND	250.00
Acetone	212.00	NA	NA	NA	212.00	90.03	125.00
Carbon disulfide	ND	NA	NA	NA	ND	47.13	25.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/21/2021				2021-2022	2020-2021	
m+p-Xylenes	ND	NA	NA	NA	ND	ND	25.00
Methyl ethyl ketone	ND	NA	NA	NA	ND	ND	50.00
o-Xylene	ND	NA	NA	NA	ND	ND	12.50
Styrene	ND	NA	NA	NA	ND	ND	12.50
Tetrahydrofuran	ND	NA	NA	NA	ND	ND	250.00
Vinyl acetate	ND	NA	NA	NA	ND	ND	250.00
BASE/NEUTRAL EXTRACTABLE PRIORITY POLLUTANTS							
1,2,4-Trichlorobenzene	ND	NA	NA	NA	ND	ND	400.00
1,2-Diphenylhydrazine	ND	NA	NA	NA	ND	ND	200.00
2,4-Dinitrotoluene	ND	NA	NA	NA	ND	ND	400.00
2,6-Dinitrotoluene	ND	NA	NA	NA	ND	ND	400.00
2-Chloronaphthalene	ND	NA	NA	NA	ND	ND	400.00
3,3'-Dichlorobenzidine	ND	NA	NA	NA	ND	ND	1000.00
4-Bromophenyl phenyl	ND	NA	NA	NA	ND	ND	400.00
4-Chlorophenyl phenyl ether	ND	NA	NA	NA	ND	ND	400.00
Acenaphthene	ND	NA	NA	NA	ND	ND	200.00
Acenaphthylene	ND	NA	NA	NA	ND	ND	400.00
Anthracene	ND	NA	NA	NA	ND	ND	400.00
Benzidine	ND	NA	NA	NA	ND	ND	1000.00
Benzo(a)anthracene	ND	NA	NA	NA	ND	ND	400.00
Benzo(a)pyrene	ND	NA	NA	NA	ND	ND	400.00
Benzo(b)fluoranthene	ND	NA	NA	NA	ND	ND	400.00
Benzo(g,h,i)perylene	ND	NA	NA	NA	ND	ND	800.00
Benzo(k)fluoranthene	ND	NA	NA	NA	ND	ND	400.00
Bis(2-chloroethoxy)methane	ND	NA	NA	NA	ND	ND	400.00
Bis(2-Chloroethyl) ether	ND	NA	NA	NA	ND	ND	200.00
Bis(2-Chloroisopropyl) ether	ND	NA	NA	NA	ND	ND	400.00
Bis(2-Ethylhexyl) phthalate	ND	NA	NA	NA	ND	18.33	1000.00
Butyl benzyl phthalate	ND	NA	NA	NA	ND	ND	400.00
Chrysene	ND	NA	NA	NA	ND	ND	400.00
Dibenzo(a,h)anthracene	ND	NA	NA	NA	ND	ND	800.00
Diethyl phthalate	ND	NA	NA	NA	ND	ND	400.00
Dimethyl phthalate	ND	NA	NA	NA	ND	ND	400.00
Di-N-Butylphthalate	ND	NA	NA	NA	ND	ND	400.00
Di-N-Octylphthalate	ND	NA	NA	NA	ND	ND	400.00
Fluoranthene	ND	NA	NA	NA	ND	ND	200.00
Fluorene	ND	NA	NA	NA	ND	ND	400.00
Hexachlorobenzene	ND	NA	NA	NA	ND	ND	200.00
Hexachlorobutadiene	ND	NA	NA	NA	ND	ND	200.00

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/21/2021				2021-2022	2020-2021	
Hexachlorocyclopentadiene	ND	NA	NA	NA	ND	ND	1000.00
Hexachloroethane	ND	NA	NA	NA	ND	ND	200.00
Indeno(1,2,3-cd)pyrene	ND	NA	NA	NA	ND	ND	800.00
Isophorone	ND	NA	NA	NA	ND	ND	200.00
Naphthalene	ND	NA	NA	NA	ND	ND	200.00
Nitrobenzene	ND	NA	NA	NA	ND	ND	200.00
N-Nitrosodimethylamine	ND	NA	NA	NA	ND	ND	400.00
N-Nitrosodi-n-propylamine	ND	NA	NA	NA	ND	ND	400.00
N-Nitrosodiphenylamine	ND	NA	NA	NA	ND	ND	200.00
Phenanthrene	ND	NA	NA	NA	ND	ND	400.00
Pyrene	ND	NA	NA	NA	ND	ND	400.00
ACID EXTRACTABLE PRIORITY POLLUTANTS							
2,4,6-Trichlorophenol	ND	NA	NA	NA	ND	ND	400.00
2,4-Dichlorophenol	ND	NA	NA	NA	ND	ND	400.00
2,4-Dimethylphenol	ND	NA	NA	NA	ND	ND	400.00
2,4-Dinitrophenol	ND	NA	NA	NA	ND	ND	1000.00
2-Chlorophenol	ND	NA	NA	NA	ND	ND	400.00
2-Nitrophenol	ND	NA	NA	NA	ND	ND	400.00
4,6-Dinitro-o-cresol	ND	NA	NA	NA	ND	ND	1000.00
4-Nitrophenol	ND	NA	NA	NA	ND	ND	2000.00
p-Chloro-m-cresol	ND	NA	NA	NA	ND	ND	200.00
Pentachlorophenol	ND	NA	NA	NA	ND	ND	400.00
Phenol	ND	NA	NA	NA	ND	24.65	200.00
BNA EXTRACTABLE POLLUTANTS – HAZARDOUS SUBSTANCES							
2,4,5-Trichlorophenol	ND	NA	NA	NA	ND	ND	1000.00
2-Methylnaphthalene	NA	NA	NA	NA	NA	NA	0.00
2-Methylphenol	ND	NA	NA	NA	ND	ND	1000.00
2-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
3-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
4-Chloroaniline	NA	NA	NA	NA	NA	NA	0.00
3&4-Methylphenol	365.00	NA	NA	NA	365.00	21.05	200.00
4-Nitroaniline	NA	NA	NA	NA	NA	NA	0.00
Aniline	NA	NA	NA	NA	NA	NA	0.00
Benzoic acid	NA	NA	NA	NA	NA	NA	0.00
Benzyl alcohol	NA	NA	NA	NA	NA	NA	0.00
Dibenzofuran	NA	NA	NA	NA	NA	NA	0.00
PRIORITY POLLUTANT PESTICIDES							
4,4'-DDD	ND	NA	NA	NA	ND	ND	0.05
4,4'-DDE	ND	NA	NA	NA	ND	ND	0.05

APPENDIX G
SUMMARY OF ORGANIC PRIORITY POLLUTANT ANALYSES
SLUDGE, FY 2021-2022
MICHELSON WATER RECYCLING PLANT (IRWD)
(all test results in µg/L except as noted)

Quarter	1	2	3	4	Average	Average	ML
Sample Date	7/21/2021				2021-2022	2020-2021	
4,4'-DDT	ND	NA	NA	NA	ND	ND	0.02
Aldrin	ND	NA	NA	NA	ND	ND	0.01
Alpha-BHC	ND	NA	NA	NA	ND	ND	0.02
Beta-BHC	ND	NA	NA	NA	ND	ND	0.02
Chlordane	ND	NA	NA	NA	ND	ND	1.00
Delta-BHC	ND	NA	NA	NA	ND	ND	0.02
Dieldrin	ND	NA	NA	NA	ND	ND	0.04
Endosulfan sulfate	ND	NA	NA	NA	ND	ND	0.05
Endosulfan-I	ND	NA	NA	NA	ND	ND	0.04
Endosulfan-II	ND	NA	NA	NA	ND	ND	0.02
Endrin	ND	NA	NA	NA	ND	ND	0.04
Endrin aldehyde	ND	NA	NA	NA	ND	ND	0.02
Heptachlor	ND	NA	NA	NA	ND	ND	0.04
Heptachlor epoxide	ND	NA	NA	NA	ND	ND	0.02
Lindane	ND	NA	NA	NA	ND	ND	0.04
Methoxychlor	ND	NA	NA	NA	ND	ND	0.05
PCB-1016	ND	NA	NA	NA	ND	ND	3.00
PCB-1221	ND	NA	NA	NA	ND	NA	3.00
PCB-1232	ND	NA	NA	NA	ND	ND	3.00
PCB-1242	ND	NA	NA	NA	ND	ND	3.00
PCB-1248	ND	NA	NA	NA	ND	ND	3.00
PCB-1254	ND	NA	NA	NA	ND	ND	3.00
PCB-1260	ND	NA	NA	NA	ND	ND	3.00
Toxaphene	ND	NA	NA	NA	ND	ND	5.00

ML method limit
ND non-detect
NA not analyzed
µg/L microgram per liter
* estimated concentration

Appendix H. Santa Ana Watershed Project Authority
(SAWPA) Reports, Data, SNC Notice



Santa Ana Watershed Project Authority

OVER 50 YEARS OF INNOVATION, VISION, AND WATERSHED LEADERSHIP

August 24, 2022

Ms. Rose Cardoza
Senior Environmental Specialist
Environmental Compliance
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708-7018

Subject: Annual Report, Inland Empire Brine Line (FY 2021 - 2022)

Dear Ms. Cardoza:

This annual report has been prepared in the format provided by OC San. Information has been provided from SAWPA and its member/contract agencies: the City of Beaumont (Beaumont), Eastern Municipal Water District (EMWD), Inland Empire Utilities Agency (IEUA), Jurupa Community Services District (JCSD), San Bernardino Municipal Water Department (SBMWD), San Bernardino Valley Municipal Water District (Valley District), Western Municipal Water District (WMWD), and Yucaipa Valley Water District (YVWD).

1. Significant Noncompliance Publication.

SAWPA had no permittees who were in Significant Noncompliance during the period of July 1, 2021, through June 30, 2022.

2. Reporting Clarification.

The July 23, 2021, September 29, 2021, January 21, 2022, and May 20, 2022, Monitoring Data for the Mountainview Generating Station, and the July 7, 2021, November 10, 2021, May 2, 2022, and May 17, 2022, Monitoring Data for OLS Energy - Chino indicates a detectable level for the constituent of Total Toxic Organics (TTOs). However, additional data provided by the permittee sufficiently clarified the source of the TTOs did not come from the cooling tower maintenance chemicals, but instead the source water. As such, the result was not determined to be a violation of the wastewater discharge permit.

Several updates were made to the Annual Water Quality Report from the previously submitted Quarterly Reports:

- a. The following monitoring data was sampled during the Third Quarter, but were entered or received after the Third Quarterly Report submittal:
 - Corona Regional Medical Center – 1/25/22 Self-Monitoring Report
 - Magnolia Foods – 2/3/22 Self-Monitoring Report
 - Qualified Mobile, Inc. – 3/30/22 Self-Monitoring Report
 - Temescal Desalter – 1/12/22 Self-Monitoring Report

Marco Tule
Chair
Inland Empire
Utilities Agency

Bruce Whitaker
Vice Chair
Orange County
Water District

Mike Gardner
Secretary-Treasurer
Western Municipal
Water District

June D. Hayes
Commissioner
San Bernardino Valley
Municipal Water District

David J. Slawson
Commissioner
Eastern Municipal
Water District

Jeffrey J. Mosher
General Manager

b. The following monitoring data was sampled during the Fourth Quarter, but were entered or received after the Fourth Quarterly Report submittal:

- Green River Golf Club – 4/20/22 control authority monitoring
- JCSD Wells 17 & 18 Ion Exchange Treatment Facility – 4/20/22 Self-Monitoring Report

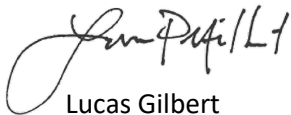
3. Flows.

Total flow measured by OC San at the Orange County SARI Metering Station (SMS) during the 12-month reporting period (July 1, 2021, through June 30, 2022) was 3,984 million gallons.

I certify, under penalty of law, that the information submitted in the attached documents (Attachments 1, 2, 3, 4, 5, and 6), were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Moreover, based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, the information submitted is, to the best of my knowledge, true, accurate, and complete.

Please contact the undersigned at (951) 354-4245 if any additional information is needed.

Sincerely,



Lucas Gilbert
Manager of Permitting and Pretreatment

Attachments:

1. Annual Report Chapter 7.4
2. Appendix F – Acknowledgements
3. Appendix H – List of SIUs with Monitoring Compliance Status
4. Appendix H – Permittees with Pretreatment Equipment
5. Appendix J – Monitoring and Compliance Status Report
6. Water Quality Data – Alphabetical by Permittee

E-Copy: Kiran Kaur, OC San

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2021 – JUNE 30, 2022
LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
Anita B. Smith Treatment Facility	WMWD	Direct	D1074-5	2100 Fleetwood Drive Jurupa Valley, CA 92509	221310	SIU	403.5(d)	-	4	8	4			
Aramark Uniform & Career Apparel, LLC	WMWD	Direct	D1004-2	1135 Hall Avenue Riverside, CA 92509	812332	SIU	403.5(d)	-	5	12	28			
California Institution for Men	IEUA	Direct	D1006-4	5997 Edison Avenue Chino, CA 91710	922140	SIU	403.5(d)	-	4	14	26			
Chino I Desalter	SAWPA	Direct	D1081-5	6905 Kimball Avenue Chino, CA 91709	221310	SIU	403.5(d)	-	4	8	4			
Chino II Desalter	SAWPA	Direct	D1010-5	11251 Harrel Street, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	16	10			
City of Beaumont Wastewater Treatment Plant	SAWPA	Direct	D1129-1	715 East 4th Street, Beaumont, CA 92223	221320	SIU	403.5(d)	-	4	0	2			
City of Colton - Agua Mansa Power Plant	VALLEY	Direct	D1002-5	2040 W. Agua Mansa Road, Colton, CA 92324	221122	SIU	403.5(d)	-	4	20	20			
Dart Container Corporation	WMWD	Direct	D1019-4	150 S. Maple Street Corona, CA 92880	326140	SIU	403.5(d)	-	4	8	24			
Del Real, LLC	JCSD	Direct	D1021-4	11041 Inland Avenue, Jurupa Valley, CA 91752	311991	SIU	403.5(d)	-	4	28	25			
EMWD Perris & Menifee Desalination Facility	SAWPA	Direct	D1061-5	29541 Murrieta Road, Menifee, CA 92586	221310	SIU	403.5(d)	-	4	9	6			
Infineon Technologies Americas Corporation	EMWD	Indirect	I1039-4	41915 Business Park Drive, Temecula, CA 92590	334413	CIU	469.18	Y	4	8	8			
In-N-Out Burger, Chino Distribution Center	IEUA	Direct	D1134-1	16000 Quality Way, Chino, CA 91708	493120 722513	SIU	403.5(d)	-	1	0	0			New permit issued 3/15/2022
JCSD Etiwanda Metering Station	SAWPA	Direct	D1044-5	Etiwanda Ave. and north of Bellegrave Ave., Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	32	24			
JCSD Hamner Metering Station	SAWPA	Direct	D1045-5	5410 Hamner Avenue, Eastvale, CA 91752	221320	SIU	403.5(d)	-	4	16	16			
JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SAWPA	Direct	D1070-5	4150 Etiwanda Avenue, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	8	4			

APPENDIX H
SANTA ANA WATERSHED PROJECT AUTHORITY (SAWPA) JULY 1, 2021 – JUNE 30, 2022
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Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SAWPA	Direct	D1040-5	3474 De Forest Circle, Jurupa Valley, CA 91752	221310	SIU	403.5(d)	-	4	2	2			
JCSD Wineville Metering Station	SAWPA	Direct	D1048-5	5101 Wineville Avenue, Jurupa Valley, CA 91752	221320	SIU	403.5(d)	-	4	12	24			
Metal Container Corporation	JCSD	Direct	D1056-4	10980 Inland Avenue, Jurupa Valley, CA 91752	322431	CIU	465.45(d)	-	4	28	16	O&G Mineral, Manganese (Local)		
Mission Linen Supply	IEUA	Direct	D1057-5	5400 Alton Street, Chino, CA 91710	812332	SIU	403.5(d)	-	4	40	45			
Mountainview Generating Station	VALLEY	Direct	D1058-3.1	2492 W. San Bernardino Ave., Redlands, CA 92374	221112	CIU	423.17	Y	4	23	25			
Niagara Bottling, LLC (IEUA)	IEUA	Indirect	I1114-2	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	3	8	1	pH (Local)		
Niagara Bottling, LLC (SBMWD)	SBMWD	Indirect	I1111-2	1401 N. Alder Avenue, Rialto, CA 92376	312112	SIU	403.5(d)	-	5	27	28			
OLS Energy	IEUA	Direct	D1059-4	5601 Eucalyptus Avenue, Chino, CA 91710	221112	CIU	423.17	-	4	33	47			
Pyrite Canyon Treatment Facility	SAWPA	Direct	D1079-4	3400 Pyrite Street, Jurupa Valley, CA 92509	562910 562211	SIU	403.5(d)	-	4	36	260			
Rayne Water Conditioning	SBMWD	Indirect	I1066-3	939 W. Reece Street, San Bernardino, CA 92411	238220 454390 561990	SIU	403.5(d)	-	5	24	9			
Repet, Inc.	IEUA	Direct	D1069-5	14207 Monte Vista Avenue, Chino, CA 91710	423930	SIU	403.5(d)	-	4	38	39			
Rialto Bioenergy Facility, LLC	VALLEY	Direct	D1130-1	503 E. Santa Ana Avenue, Bloomington, CA 92316	562219 221118 221320	SIU	403.5(d)	-	6	24	649	BOD, TSS, pH (Local)		
Temescal Desalter	WMWD	Direct	D1012-4	745 Public Safety Way, Corona, CA 92880	221310	SIU	403.5(d)	-	4	8	4			
Wellington Foods, Inc.	WMWD	Direct	D1086-4	1930 California Avenue, Corona, CA 92881	311999	SIU	403.5(d)	-	4	8	25			

APPENDIX H
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LIST OF SIUs WITH MONITORING COMPLIANCE STATUS

Facility Name	Member/ Contract Agency	Direct / Indirect Discharger	Permit No.	Physical Address	NAICS Code	Classification	Regulation	TTO Waiver Issued	No. of Inspections	Agency Samples	SMR Samples	Pollutant(s) in Discharge Violation	SNC Status	Comment
WMWD Arlington Desalter	SAWPA	Direct	D1088-5	11611 Sterling Avenue, Riverside, CA 92503	221310	SIU	403.5(d)	-	4	8	4			
YVWD Henry Wochholz Regional Water Recycling Facility	SAWPA	Direct	D1090-4	880 W. County Line, Road, Calimesa, CA 92320	221310 221320	SIU	403.5(d)	-	4	8	9			

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2021-2022
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other	
WMWD	D1074-5	Anita B. Smith Treatment Facility	SIU 40 CFR 403.5(d)	0.030									X																		
WMWD	D1004-2	Aramark Uniform & Career Apparel, LLC	SIU 40 CFR 403.5(d)	0.330							X			X			X				X			X		X	X		X		
IEUA	I1005-4	C.C. Graber Company	IU 40 CFR 403.5(d)	N/A										X																Sand Filters, Cartridge Filters	
IEUA	D1006-4	California Institution for Men	SIU 40 CFR 403.5(d)	0.194										X																	
IEUA	D1007-4	California Institution for Women	IU 40 CFR 403.5(d)	0.400											X															Grease Interceptors and Sewage Grinder	
SAWPA	D1081-5	Chino I Desalter	SIU 40 CFR 403.5(d)	2.050										X																	
SAWPA	D1010-5	Chino II Desalter	SIU 40 CFR 403.5(d)	2.020										X																	
SAWPA	D1129-1	City of Beaumont Wastewater Treatment Plant	SIU 40 CFR 403.5(d)	0.550									X																		
Valley	D1002-5	City of Colton - Agua Mansa Power Plant	SIU 40 CFR 403.5(d)	0.062														X												Ultra-Filtration	

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SAWPA PRETREATMENT PROGRAM FY 2021-2022
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Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
WMWD	I1016-4	Corona Regional Medical Center	IU 40 CFR 403.5(d)	N/A									X																	
WMWD	D1019-4	Dart Container Corporation	SIU 40 CFR 403.5(d)	0.030								X		X							X	X								
WMWD	I1020-3	Decra Roofing Systems	IU 40 CFR 403.5(d)	N/A								X		X								X		X		X				
JCSD	D1021-4	Del Real, LLC	SIU 40 CFR 403.5(d)	0.190			X					X		X	X						X			X						DAF & Automated Chemical Feed
IEUA	I1024-3	Eastside Water Treatment Facility	IU 40 CFR 403.5(d)	N/A									X																	
SBMWD	I1003-5	Emerald Colton	IU 40 CFR 403.5(d)	N/A									X																	
SAWPA	D1061-5	EMWD Perris & Menifee Desalination Facility	SIU 40 CFR 403.5(d)	4.048									X																	Filtration, Green Sand for Iron & Manganese
WMWD	D1029-3	Frutarom USA, Inc.	IU 40 CFR 403.5(d)	2.150								X		X				X			X	X								
IEUA	D1032-3	Green River Golf Club	IU 40 CFR 403.5(d)	0.020											X															Grease Interceptor

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Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
EMWD	I1133-1	Indian Oaks Campground, LLC	IU 40 CFR 403.5(d)	N/A									X																	
EMWD	I1039-4	Infineon Technologies Americas Corporation	CIU 40 CFR 469.18	N/A										X							X					X				
IEUA	D1134-1	In-N-Out Burger, Chino Distribution Center	SIU 40 CFR 403.5(d)	0.086																										
SAWPA	D1044-5	JCSD Etiwanda Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
SAWPA	D1045-5	JCSD Hamner Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	
SAWPA	D1070-5	JCSD Roger D. Teagarden Ion Exchange Water Treatment Plant	SIU 40 CFR 403.5(d)	0.300								X																		
SAWPA	D1040-5	JCSD Wells 17 & 18 Ion Exchange Treatment Facility	SIU 40 CFR 403.5(d)	0.300									X																	
SAWPA	D1048-5	JCSD Wineville Metering Station	SIU 40 CFR 403.5(d)	1.155									X																	

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2021-2022
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
WMWD	I1050-4	La Sierra University	IU 40 CFR 403.5(d)	N/A									X																	
SBMWD	I1051-3	Loma Linda University Power Plant	IU 40 CFR 403.5(d)	N/A									X																	TDS Meter and Diversion Valve
SBMWD	I1052-4	Loma Linda Veterans Medical Center	IU 40 CFR 403.5(d)	N/A									X																	
JCSD	D1053-3	Magnolia Foods, LLC	IU 40 CFR 403.5(d)	0.004											X						X									Grease Interceptor
JCSD	D1056-4	Metal Container Corporation	CIU 40 CFR 465.45(d)	0.165								X	X				X						X	X	X	X				Oil Skimming
IEUA	D1057-5	Mission Linen Supply	SIU 40 CFR 403.5(d)	0.713								X	X										X	X						Shaker Screens
Valley	D1058-3.1	Mountainview Generating Station	CIU 40 CFR 423.17	0.432			X							X				X			X		X							Filtration
IEUA	I1114-2	Niagra Bottling, LLC (IEUA)	SIU 40 CFR 403.5(d)	N/A									X																	
SBMWD	I1111-2	Niagra Bottling, LLC (SBMWD)	SIU 40 CFR 403.5(d)	N/A									X																	

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2021-2022
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other
IEUA	D1059-4	OLS Energy	CIU 40 CFR 423.17	0.130									X				X													
WMWD	I1062-4	Prudential Overall Supply	IU 40 CFR 403.5(d)	N/A								X																		
SAWPA	D1079-4	Pyrite Canyon Treatment Facility	SIU 40 CFR 403.5(d)	0.259								X		X				X								X				Air Strippers, Pesticide Co-Precipitation, Inline Cloth Filters, Granulated Activate Carbon Absorption
WMWD	I1064-4	Qualified Mobile, Inc.	IU 40 CFR 403.5(d)	N/A										X							X	X								
SBMWD	I1066-3	Rayne Water Conditioning	SIU 40 CFR 403.5(d)	N/A			X																							EC Meter and Diversion Valve
IEUA	D1069-5	Repet, Inc.	SIU 40 CFR 403.5(d)	0.043								X		X							X		X	X		X	X			GEM., Drum & Shaker Screens
Valley	D1130-1	Rialto Bioenergy Facility, LLC	SIU 40 CFR 403.5(d)	0.250								X		X						X	X		X	X		X	X	X		Biological Treatment
IEUA	I1096-3	San Antonio Regional Hospital	IU 40 CFR 403.5(d)	N/A								X																		

**APPENDIX H
SAWPA PRETREATMENT PROGRAM FY 2021-2022
PERMITTEES WITH PRETREATMENT EQUIPMENT**

Agency	Permit No.	Permittees	Category	Flow Base (MGD)	Aluminum Chip Reactor	Cyanide Destruction	Ion Exchange	Final Polishing Filter	Electroless Nickel Dechelating	Hex. Chrome Reduction	Cross-flow Filtration (Memtek)	Equalization	None	pH Adjustment	Below Ground Clarifier	Electrowinning/Plate-out	Ozone Treatment Reactor	Oil/Water Separator	Carbon Adsorption	Centrifugation	Final pH Adjust	Batch Treatment	Clarifier/lamella Setting	Coagulation/Flocculation	Hydroxide Precipitation	Filter Press	Sludge Thickening Tank	Sorption Filter (Lancy)	Air Floatation	Other	
WMWD	I1128-1	Saratoga Foods Specialties - Eastvale	IU 40 CFR 403.5(d)	N/A									X																		
SAWPA	D1124-1	SCE Mira Loma Peaker Plant	IU 40 CFR 403.5(d)	N/A														X													
WMWD	I1078-5	Sierra Aluminum Company, Inc.	IU 40 CFR 403.5(d)	N/A									X																		
WMWD	D1012-4	Temescal Desalter	SIU 40 CFR 403.5(d)	2.150									X																		
WMWD	D1086-4	Wellington Foods, Inc.	SIU 40 CFR 403.5(d)	0.030								X		X							X	X									
SAWPA	D1088-5	WMWD Arlington Desalter	SIU 40 CFR 403.5(d)	1.400									X																		
SAWPA	D1090-4	YVWD – Henry Wochholz Regional Water Recycling Facility	SIU 40 CFR 403.5(d)	0.595									X																		



Appendix J
Monitoring and Compliance Status Report
July 1, 2021 - June 30, 2022



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Anita B. Smith Treatment Facility	1	1	0	2	0	2	0	CAC		
2100 Fleetwood Drive	2	1	0	2	0	0	0	CAC		
Jurupa Valley, CA 92509	3	1	0	2	0	0	0	CAC		
Permit No. D1074-5	4	1	0	2	0	2	0	CAC		
Aramark Uniform & Career Apparel, LLC	1	1	1	2	3	4	0	CAC		
1135 Hall Avenue	2	1	1	2	3	4	0	CAC		
Riverside, CA 92509	3	1	1	2	3	4	0	CAC		
Permit No. D1004-2	4	2	1	2	3	4	0	CAC		
C.C. Graber Company	1	1	0	0	0	0	0	CAC		
315 E. 4th Street	2	0	0	8	0	9	0	CAC		
Ontario, CA 91764	3	0	0	0	0	0	0	CAC		
Permit No. I1005-4	4	1	0	0	0	0	0	CAC		
California Institution for Men	1	1	1	0	3	4	0	CAC		
5997 Edison Avenue	2	1	2	2	3	3	0	CAC		
Chino, CA 91710	3	1	1	2	3	4	0	CAC		
Permit No. D1006-4	4	1	1	5	3	3	0	CAC		
California Institution for Women	1	1	3	6	4	7	0	CAC		
16756 Chino Corona Road	2	1	3	7	4	8	0	CAC		
Corona, CA 92880	3	1	3	6	3	7	0	CAC		
Permit No. D1007-4	4	1	3	7	3	6	0	CAC		
Chino I Desalter	1	1	1	1	1	1	0	CAC		
6905 Kimball Avenue	2	1	1	1	0	0	0	CAC		
Chino, CA 91709	3	1	1	1	1	1	0	CAC		
Permit No. D1081-5	4	1	1	1	0	0	0	CAC		
Chino II Desalter	1	1	2	2	3	3	0	CAC		
11251 Harrel Street	2	1	2	2	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	2	2	2	2	0	CAC		
Permit No. D1010-5	4	1	2	2	0	0	0	CAC		
City of Beaumont Wastewater Treatment Plant	1	1	0	0	1	1	0	CAC		
715 East 4th Street	2	1	0	0	0	0	0	CAC		
Beaumont, CA 92223	3	1	0	0	0	0	0	CAC		
Permit No. D1129-1	4	1	0	0	0	0	0	CAC		
City of Colton - Agua Mansa Power Plant	1	1	1	4	1	4	0	CAC		
2040 W. Agua Mansa Road	2	1	1	4	1	4	0	CAC		
Colton, CA 92324	3	1	1	4	1	4	0	CAC		
Permit No. D1002-5	4	1	1	4	1	4	0	CAC		

COMPLIANCE STATUS

ID - Insufficient Data

CAC - Consistently Achieving Compliance

IAC - Inconsistently Achieving Compliance

SNC - Significant Non Compliance

NOV/OCA - Notice of Violation and Order for Corrective Action

WW - Written Warning



Appendix J
Monitoring and Compliance Status Report
July 1, 2021 - June 30, 2022



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Corona Regional Medical Center	1	0	0	0	0	0	0	CAC		
800 S. Main Street	2	0	0	0	0	0	0	CAC		
Corona, CA 92882	3	1	0	2	0	2	0	CAC		
Permit No. I1016-4	4	0	0	0	0	0	0	CAC		
Dart Container Corporation	1	1	1	1	3	3	0	CAC		
150 S. Maple Street	2	1	1	1	3	3	0	CAC		
Corona, CA 92880	3	1	1	1	3	3	0	CAC		
Permit No. D1019-4	4	1	1	1	3	3	0	CAC		
Decra Roofing Systems	1	0	0	0	0	7	0	CAC		
1230 Railroad Street	2	1	0	3	0	9	0	CAC		
Corona, CA 92882	3	0	0	0	0	9	0	CAC		
Permit No. I1020-3	4	1	0	3	0	7	0	CAC		
Del Real, LLC	1	1	4	3	1	3	0	CAC		
11041 Inland Avenue	2	1	4	3	4	3	0	CAC		
Jurupa Valley, CA 91752	3	1	4	3	4	3	0	CAC		
Permit No. D1021-4	4	1	4	3	4	3	0	CAC		
Eastside Water Treatment Plant	1	1	0	3	0	14	0	CAC		
7537 Schaefer Avenue	2	1	0	3	0	14	0	IAC	1	NOV: pH violation
Ontario, CA 91761	3	1	0	6	0	14	0	CAC		
Permit No. I1024-3	4	1	0	3	0	14	0	CAC		
Emerald Colton	1	0	0	0	0	0	0	CAC		
925 South 8th Street	2	0	0	0	0	0	0	CAC		
Colton, CA 92324	3	1	0	6	0	3	0	CAC		
Permit No. I1003-5	4	0	0	0	0	0	0	CAC		
EMWD Perris & Menifee Desalination Facility	1	1	1	0	1	1	0	CAC		
29541 Murrieta Road	2	1	1	1	0	0	0	CAC		
Menifee, CA 92586	3	1	1	1	1	1	0	CAC		
Permit No. D1061-5	4	1	2	2	1	1	0	CAC		
Frutarom USA, Inc.	1	0	1	2	3	3	0	CAC		
790 E. Harrison Street	2	1	1	1	3	4	0	CAC		
Corona, CA 92879	3	0	1	1	3	3	0	CAC		
Permit No. D1029-3	4	1	1	2	3	4	0	CAC		
Green River Golf Club	1	0	0	0	3	3	0	CAC		
5215 Green River Road	2	1	1	2	3	3	0	CAC		
Corona, CA 92880	3	0	0	0	3	3	0	CAC		
Permit No. D1032-3	4	1	1	3	3	4	0	CAC		

COMPLIANCE STATUS

ID - Insufficient Data
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NOV/OCA - Notice of Violation and Order for Corrective Action
WW - Written Warning



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July 1, 2021 - June 30, 2022



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Indian Oaks Campground, LLC	1	0	0	0	0	2	0	CAC		
38120 E. Benton Road	2	1	0	0	0	0	0	CAC		
Temecula, CA 92593	3	0	0	0	0	0	0	CAC		
Permit No. I1133-1	4	1	0	0	0	0	0	CAC		
In-N-Out Burger, Chino Distribution Center	1	0	0	0	0	0	0	CAC		
16000 Quality Way	2	0	0	0	0	0	0	CAC		
Chino, CA 91708	3	0	0	0	0	0	0	CAC		Permit Issued 3/15/22
Permit No. D1134-1	4	1	0	0	0	0	0	CAC		
Infineon Technologies Americas Corp.	1	1	1	1	1	1	0	CAC		
41915 Business Park Drive	2	1	0	2	1	1	0	CAC		
Temecula, CA 92590	3	1	1	1	1	1	0	CAC		
Permit No. I1039-4	4	1	1	1	1	1	0	CAC		
JCSD Etiwanda Metering Station	1	1	3	5	3	3	0	CAC		
Etiwanda Ave. and north of Bellegrave Ave.	2	1	3	5	3	3	0	CAC		
Jurupa Valley, CA 91752	3	1	3	5	3	3	0	CAC		
Permit No. D1044-5	4	1	3	5	3	3	0	CAC		
JCSD Hamner Metering Station	1	1	1	3	1	3	0	CAC		
5410 Hamner Avenue	2	1	1	3	1	3	0	CAC		
Eastvale, CA 91752	3	1	1	3	1	3	0	CAC		
Permit No. D1045-5	4	1	1	3	1	3	0	CAC		
JCSD Roger D. Teagarden Ion Exchange WTP	1	1	1	1	1	3	0	CAC		
4150 Etiwanda Avenue	2	1	1	1	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	1	1	0	0	0	CAC		
Permit No. D1070-5	4	1	1	1	0	0	0	CAC		
JCSD Wells 17 & 18 Ion Exchange TF	1	1	1	1	0	0	0	CAC		
3474 De Forest Circle	2	1	0	0	0	0	0	CAC		
Jurupa Valley, CA 91752	3	1	0	0	0	0	0	CAC		
Permit No. D1040-5	4	1	0	0	1	1	0	CAC		
JCSD Wineville Metering Station	1	1	0	0	3	3	0	CAC		
5101 Wineville Avenue	2	1	1	3	3	3	0	CAC		
Jurupa Valley, CA 91752	3	1	1	3	3	3	0	CAC		
Permit No. D1048-5	4	1	1	3	3	3	0	CAC		
La Sierra University	1	0	0	0	0	0	0	CAC		
4500 Riverwalk Pkwy.	2	0	0	0	0	0	0	CAC		
Riverside, CA 92505	3	1	0	2	0	2	0	CAC		
Permit No. I1050-4	4	0	0	0	0	0	0	CAC		

COMPLIANCE STATUS

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Appendix J
Monitoring and Compliance Status Report
July 1, 2021 - June 30, 2022



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Loma Linda University Power Plant	1	0	0	0	0	0	0	CAC		
11100 Anderson Street	2	0	0	0	0	0	0	CAC		
Loma Linda, CA 92350	3	1	0	6	0	3	0	CAC		
Permit No. I1051-3	4	0	0	0	0	0	0	CAC		
Loma Linda Veterans Medical Center	1	0	0	0	0	0	0	CAC		
11201 Benton Street	2	0	0	0	0	0	0	CAC		
Loma Linda, CA 92357	3	1	0	6	0	4	0	CAC		
Permit No. I1052-4	4	0	0	0	0	0	0	CAC		
Magnolia Foods	1	1	3	0	1	3	0	CAC		
11058 Philadelphia Avenue	2	1	4	3	0	0	0	CAC		
Mira Loma, CA 91752	3	1	3	0	1	3	0	CAC		
Permit No. D1053-3	4	1	4	3	0	0	0	CAC		
Metal Container Corporation	1	1	4	1	1	5	0	CAC	3	WW: Manganese and Oil and Grease
10980 Inland Avenue	2	1	4	5	1	1	0	CAC		
Jurupa Valley, CA 91752	3	1	4	1	1	5	0	CAC		
Permit No. D1056-4	4	1	4	5	1	1	0	CAC		
Mission Linen Supply	1	1	3	7	4	7	0	CAC		
5400 Alton Street	2	1	3	7	3	7	0	CAC		
Chino, CA 91710	3	1	3	7	6	7	0	CAC		
Permit No. D1057-5	4	1	3	7	4	7	0	CAC		
Mountainview Generating Station	1	1	2	5	2	4	0	CAC		
2492 W. San Bernardino Avenue	2	1	2	3	2	4	0	CAC		
Redlands, CA 92374	3	1	2	3	2	5	0	CAC		
Permit No. D1058-3.1	4	1	2	4	2	4	0	CAC		
Niagara Bottling, LLC (IEUA)	1	0	0	0	0	0	0	CAC		
1401 N. Alder Avenue	2	1	0	2	0	1	0	IAC	2	NOV: pH violation
Rialto, CA 92376	3	1	0	3	0	0	0	CAC		
Permit No. I1114-2	4	1	0	3	0	0	0	CAC		
Niagara Bottling, LLC (SBMWD)	1	1	0	6	0	7	0	CAC		
1401 N. Alder Avenue	2	1	0	6	0	7	0	CAC		
Rialto, CA 92376	3	1	0	9	0	7	0	CAC		
Permit No. I1111-2	4	2	0	6	0	7	0	CAC		
OLS Energy	1	1	2	3	4	10	0	CAC		
5601 Eucalyptus Avenue	2	1	2	8	4	9	0	CAC		
Chino, CA 91710	3	1	2	5	4	7	0	CAC		
Permit No. D1059-4	4	1	2	9	4	5	0	CAC		

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Appendix J
Monitoring and Compliance Status Report
July 1, 2021 - June 30, 2022



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCS D SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Prudential Overall Supply	1	0	0	0	0	0	0	CAC		
6997 Jurupa Ave	2	0	0	0	0	0	0	CAC		
Riverside, CA 92504	3	0	0	0	0	0	0	CAC		
Permit No. I1062-4	4	2	0	2	0	3	0	CAC		
Pyrite Canyon Treatment Facility	1	1	2	7	18	46	0	CAC		
3400 Pyrite Street	2	1	2	7	18	49	0	CAC		
Jurupa Valley, CA 92509	3	1	2	7	19	46	0	CAC		
Permit No. D1079-4	4	1	2	7	18	46	0	CAC		
Qualified Mobile, Inc.	1	0	0	0	0	0	0	CAC		
1648 Industrial Ave., Suite A	2	0	0	0	0	0	0	CAC		
Norco, CA 92860	3	2	0	2	0	2	0	CAC		
Permit No. I1064-4	4	0	0	0	0	0	0	CAC		
Rayne Water Conditioning	1	1	0	6	0	3	0	CAC		
939 West Reece Street	2	1	0	6	0	1	0	CAC		
San Bernardino, CA 92411	3	1	0	6	0	4	0	IAC	1	NOV: past due report
Permit No. I1066-3	4	2	0	6	0	1	0	CAC		
Repet, Inc.	1	1	3	6	3	6	0	CAC		
14207 Monte Vista Avenue	2	1	3	7	3	7	0	CAC		
Chino, CA 91710	3	1	3	6	3	6	0	CAC		
Permit No. D1069-5	4	1	3	7	4	7	0	CAC		
Rialto Bioenergy Facility, LLC	1	1	1	5	81	72	0	IAC	8	NOV: BOD, TSS violations
503 E. Santa Ana Avenue	2	2	1	5	78	70	0	IAC	12	NOV: BOD, TSS violations
Bloomington, CA 92316	3	2	1	5	85	86	0	IAC	27	NOV: BOD, pH, TSS; late report
Permit No. D1130-1	4	1	1	5	89	88	0	IAC	37	NOV: BOD, pH violations
San Antonio Regional Hospital	1	0	0	2	0	6	0	CAC		
999 San Bernardino Road	2	1	0	0	0	7	0	CAC		
Upland, CA 91786	3	0	0	0	0	6	0	CAC		
Permit No. I1096-3	4	1	0	3	0	7	0	CAC		
Saratoga Foods, Inc.	1	1	0	6	0	0	0	CAC		
6285 Providence Way	2	0	0	0	0	3	0	CAC		
Eastvale, CA 92880	3	1	0	0	0	0	0	CAC		
Permit No. I1128-1	4	0	0	3	0	3	0	CAC		
SCE Mira Loma Peaker Plant	1	0	0	5	0	5	0	CAC		
13568 S. Milliken Avenue	2	1	0	5	0	0	0	CAC		
Ontario, CA 91762	3	0	0	0	0	5	0	CAC		
Permit No. D1124-1	4	1	0	5	0	5	0	CAC		

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Appendix J
Monitoring and Compliance Status Report
July 1, 2021 - June 30, 2022



Facility	QTR	Inspections Completed	CONTROL AUTHORITY SAMPLES COLLECTED		SELF MONITORING SAMPLES COLLECTED		OCSD SAMPLES COLLECTED	COMPLIANCE STATUS	Violation	Comments / Enforcement Actions
			Composite	Grab	Composite	Grab	Composite	Quarterly		
Sierra Aluminum Company	1	1	0	3	0	0	0	CAC		
2345 Fleetwood Dr.	2	0	0	4	0	0	0	CAC		
Riverside, CA 92509	3	0	0	0	0	0	0	CAC		
Permit No. I1078-5	4	0	0	0	0	2	0	CAC		
Temescal Desalter	1	1	1	1	1	1	0	CAC		
745 Public Safety Way	2	1	1	1	0	0	0	CAC		
Corona, CA 92880	3	1	1	1	1	1	0	CAC		
Permit No. D1012-4	4	1	1	1	0	0	0	CAC		
Wellington Foods, Inc.	1	1	1	1	3	3	0	CAC		
1930 California Avenue	2	1	1	1	3	3	0	CAC		
Corona, CA 92881	3	1	1	1	3	3	0	CAC		
Permit No. D1086-4	4	1	1	1	4	3	0	CAC		
WMWD Arlington Desalter	1	1	1	1	1	1	0	CAC		
11611 Sterling Avenue	2	1	1	1	0	0	0	CAC		
Riverside, CA 92503	3	1	1	1	1	1	0	CAC		
Permit No. D1088-5	4	1	1	1	0	0	0	CAC		
YVWD Henry Wochholz RWRP	1	1	1	1	2	1	0	CAC		
880 W. County Line Road	2	1	1	1	1	1	0	CAC		
Calimesa, CA 92320	3	1	1	1	1	1	0	CAC		
Permit No. D1090-4	4	1	1	1	1	1	0	CAC		

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Appendix I. QA/QC Analysis Results

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JULY 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2323546	0.02	0.02	0.02	0.02	0.02	0.10		
	2323547	0.02	0.02	0.02	0.02	0.02	0.10		
	2323548	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2323549	0.02	0.02	0.02	0.02	0.02	0.10		
	2323550	0.02	0.02	0.02	0.02	0.02	0.10		
	2323551	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-531404	2323738		0.08	0.39	0.04	0.93	0.02	0.10	
		2287995	0.07	0.40	0.05	0.99	0.02	0.10	
				2.03		5.95			Relative % Difference
1-021325	2323739		0.02	0.03	0.31	0.07	0.02	0.10	
		2286973	0.02	0.04	0.31	0.07	0.02	0.03	
					0.96				Relative % Difference
1-011013	2323740		0.02	0.36	0.04	0.43	0.04	0.20	
		2286699	0.02	0.34	0.04	0.46	0.04	0.17	
				4.56		6.71			Relative % Difference
1-021735	2323741		0.02	0.02	0.27	0.21	0.02	0.10	
		2286698	0.02	0.02	0.26	0.24	0.02	0.06	
					3.42	9.78			Relative % Difference
			0%	3%	2%	7%	0%	0%	Analyte Avg. RPD
							4%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR AUGUST 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2330877	0.02	0.02	0.02	0.02	0.02	0.10		
	2330878	0.02	0.02	0.02	0.02	0.02	0.10		
	2330879	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2330880	0.02	0.02	0.02	0.02	0.02	0.10		
	2330881	0.02	0.02	0.02	0.02	0.02	0.10		
	2330882	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-600316	2330925		0.02	0.02	0.07	0.60	0.02	0.10	
		2291170	0.02	0.02	0.08	0.60	0.02	0.05	
						0.34			Relative % Difference
1-021337	2289762		0.02	0.02	0.06	0.26	0.02	0.30	
		2289762	0.02	0.02	0.06	0.25	0.02	0.29	
						2.33			Relative % Difference
1-511407	2330927		0.02	0.19	0.11	0.32	0.02	0.17	
		2291750	0.02	0.18	0.10	0.30	0.02	0.16	
				4.96	6.83	6.16			Relative % Difference
1-601843	2330928		0.02	0.03	0.04	0.14	0.20	0.10	
		2291906	0.02	0.03	0.04	0.13	0.20	0.03	
						5.84	0.00		Relative % Difference
			0%	5%	7%	4%	0%	0%	Analyte Avg. RPD
							4%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR SEPTEMBER 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2336776	0.02	0.02	0.02	0.02	0.02	0.10		
	2336777	0.02	0.02	0.02	0.02	0.02	0.10		
	2336778	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2336779	0.02	0.02	0.02	0.02	0.02	0.10		
	2336780	0.02	0.02	0.02	0.02	0.02	0.10		
	2336781	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-511370	2337063		0.02	0.02	0.47	0.49	0.02	0.15	
		2299130	0.02	0.02	0.46	0.49	0.02	0.15	
					1.50	1.02			Relative % Difference
1-600708	2337065		0.02	0.03	0.18	0.57	0.08	0.13	
		2302144	0.02	0.03	0.18	0.57	0.09	0.15	
					0.57	0.70			Relative % Difference
1-551152	2337066		0.02	0.02	0.19	0.05	0.02	0.36	
		2300606	0.02	0.02	0.19	0.05	0.02	0.41	
					0.00				Relative % Difference
1-021520	2337067		0.02	0.20	0.09	0.12	0.02	0.10	
		2299571	0.02	0.20	0.09	0.12	0.02	0.10	
				2.03		0.86			Relative % Difference
			0%	2%	1%	1%	0%	0%	Analyte Avg. RPD
							1%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR OCTOBER 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2344635	0.02	0.02	0.02	0.02	0.02	0.10		
	2344636	0.02	0.02	0.02	0.02	0.02	0.10		
	2344637	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2344638	0.02	0.02	0.02	0.02	0.02	0.10		
	2344639	0.02	0.02	0.02	0.02	0.02	0.10		
	2344640	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011354	2346926		0.02	0.02	0.03	0.89	0.02	0.10	
		2304514	0.02	0.02	0.03	0.85	0.02	0.10	
						4.13			Relative % Difference
1-011013	2346927		0.02	0.37	0.05	0.18	0.06	0.28	
		2307376	0.02	0.41	0.05	0.18	0.06	0.33	
				8.49		3.92			Relative % Difference
1-021289	2346928		0.02	0.02	0.11	1.88	0.02	0.18	
		2308114	0.02	0.02	0.11	1.84	0.02	0.17	
					4.57	2.15			Relative % Difference
1-600378	2346929		0.02	0.02	0.03	0.05	0.02	0.35	
		2308140	0.02	0.02	0.03	0.05	0.02	0.34	
									Relative % Difference
			0%	8%	5%	3%	0%	0%	Analyte Avg. RPD
							5%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR NOVEMBER 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2352068	0.02	0.02	0.02	0.02	0.02	0.10		
	2352069	0.02	0.02	0.02	0.02	0.02	0.10		
	2352070	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2352071	0.02	0.02	0.02	0.02	0.02	0.10		
	2352072	0.02	0.02	0.02	0.02	0.02	0.10		
	2352139	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011155	2352473		0.02	0.06	0.06	0.31	0.02	0.10	
		2319241	0.02	0.06	0.06	0.30	0.02	0.10	
						3.95			Relative % Difference
1-511370	2353392		0.02	0.02	0.39	0.58	0.02	0.17	
		2317816	0.02	0.02	0.37	0.57	0.02	0.15	
					7.39	2.61			Relative % Difference
1-021520	2353394		0.02	0.08	0.16	0.32	0.02	0.10	
		2317762	0.02	0.08	0.15	0.30	0.02	0.10	
					7.12	4.82			Relative % Difference
1-031036	2353395		0.02	0.02	1.11	0.02	0.02	1.93	
		2318322	0.02	0.02	1.18	0.02	0.02	2.03	
					6.11			5.05	Relative % Difference
			0%	0%	7%	4%	0%	5%	Analyte Avg. RPD
							5%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR DECEMBER 2021
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2356655	0.02	0.02	0.02	0.02	0.02	0.10		
	2356656	0.02	0.02	0.02	0.02	0.02	0.10		
	2356657	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2356658	0.02	0.02	0.02	0.02	0.02	0.10		
	2356659	0.02	0.02	0.02	0.02	0.02	0.10		
	2356660	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-601843	2356674		0.02	0.07	0.05	0.23	0.09	0.14	
		2322322	0.02	0.06	0.05	0.23	0.08	0.10	
						0.88			Relative % Difference
1-511407	2356675		0.02	0.27	0.12	0.16	0.02	0.20	
		2322319	0.02	0.26	0.11	0.16	0.02	0.21	
				3.40	2.60	3.80			Relative % Difference
1-031110	2356676		0.02	0.02	0.02	0.19	0.02	0.11	
		2323331	0.02	0.02	0.02	0.19	0.02	0.11	
						1.05			Relative % Difference
1-600378	2356677		0.02	0.02	0.04	0.02	0.02	0.30	
		2317102	0.02	0.02	0.04	0.02	0.02	0.32	
									Relative % Difference
			0%	3%	3%	2%	0%	0%	Analyte Avg. RPD
							3%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JANUARY 2022
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2363925	0.02	0.02	0.02	0.02	0.02	0.10		
	2363927	0.02	0.02	0.02	0.02	0.02	0.10		
	2363928	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2363926	0.02	0.02	0.02	0.02	0.02	0.10		
	2363929	0.02	0.02	0.02	0.02	0.02	0.10		
	2363930	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-531422	2390758		0.02	0.05	0.44	0.02	0.02	0.10	
		2348784	0.02	0.04	0.40	0.07	0.02	0.10	
					8.08				Relative % Difference
1-531404	2390759		0.06	0.25	0.02	1.67	0.02	0.10	
		2354811	0.05	0.21	0.02	1.54	0.02	0.10	
				14.91		8.10			Relative % Difference
1-011100	2390761		0.02	0.05	0.71	0.02	0.02	0.26	
		2349899	0.02	0.05	0.69	0.03	0.02	0.25	
					2.28				Relative % Difference
1-600503	2390762		0.02	0.02	0.72	0.02	0.02	0.15	
		2353294	0.02	0.02	0.66	0.09	0.02	0.12	
					8.81				Relative % Difference
			0%	15%	6%	8%	0%	0%	Analyte Avg. RPD
							10%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR FEBRUARY 2022
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
		0.02	0.02	0.02	0.02	0.02	0.10		
Sampler A	2370641	0.02	0.02	0.02	0.02	0.02	0.10		
	2370642	0.02	0.02	0.02	0.02	0.02	0.10		
	2370643	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2370644	0.02	0.02	0.02	0.02	0.02	0.10		
	2370645	0.02	0.02	0.02	0.02	0.02	0.10		
	2370646	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	Relative % Difference
1-011064	2399505		0.02	0.02	0.02	0.67	0.02	0.10	
		2356510	0.02	0.02	0.02	0.66	0.02	0.10	
						1.95			Relative % Difference
1-021336	2399506		0.02	0.04	0.04	0.02	0.02	0.10	
		2353941	0.02	0.04	0.05	0.02	0.02	0.10	
									Relative % Difference
1-021337	2399507		0.02	0.02	0.09	0.16	0.05	0.30	
		2352109	0.02	0.02	0.09	0.16	0.05	0.30	
						1.87			Relative % Difference
1-021424	2399508		0.50	0.02	0.03	0.10	0.05	0.10	
		2347074	0.48	0.02	0.04	0.10	0.03	0.10	
			2.45						Relative % Difference
			2%	0%	0%	2%	0%	0%	Analyte Avg. RPD
							2%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR MARCH 2022
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2376828	0.02	0.02	0.02	0.02	0.02	0.10		
	2376829	0.02	0.02	0.02	0.02	0.02	0.10		
	2376830	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2376831	0.02	0.02	0.02	0.02	0.02	0.10		
	2376832	0.02	0.02	0.02	0.02	0.02	0.10		
	2376833	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011046	2399509		0.02	0.26	0.07	0.02	0.02	0.10	
		2353219	0.03	0.25	0.07	0.09	0.02	0.10	
				1.57					Relative % Difference
1-601843	2399510		0.02	0.18	0.16	0.19	0.23	0.10	
		2346891	0.02	0.19	0.16	0.20	0.24	0.10	
				5.56	1.24	4.08	2.14		Relative %Difference
1-521852	2399512		0.02	0.69	0.87	1.69	0.03	0.17	
		2347302	0.02	0.72	1.25	1.98	0.04	0.18	
				5.26	36.29	15.80			Relative % Difference
1-011013	2399513		0.02	0.32	0.03	0.10	0.06	0.13	
		2352138	0.02	0.35	0.03	0.12	0.06	0.12	
				9.84		12.61			Relative % Difference
			0%	6%	19%	11%	2%	0%	Analyte Avg. RPD
							9%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR APRIL 2022
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	Reporting Limit (mg/L)	
		0.02	0.02	0.02	0.02	0.02	0.10		
Sampler A	2387310	0.02	0.02	0.02	0.02	0.02	0.10		
	2387312	0.02	0.02	0.02	0.02	0.02	0.10		
	2387313	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2387311	0.02	0.02	0.02	0.02	0.02	0.10		
	2387314	0.02	0.02	0.02	0.02	0.02	0.10		
	2387315	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	Relative % Difference
1-031341	2399514		0.02	0.02	0.33	0.02	0.02	0.10	
		2354203	0.02	0.02	0.32	0.06	0.02	0.10	
					2.15				
1-531415	2399515		0.02	0.02	0.08	0.02	0.02	0.22	
		2349678	0.02	0.02	0.08	0.02	0.02	0.20	
									Relative % Difference
1-521859	2399516		0.02	0.02	5.39	0.02	0.02	0.10	
		2345320	0.02	0.02	5.39	0.08	0.02	0.10	
					0.00				Relative % Difference
1-521859	2399517		0.02	0.02	2.99	0.45	0.02	0.10	
		2356206	0.02	0.02	2.77	0.44	0.02	0.10	
					7.64	3.60			Relative % Difference
			0%	0%	3%	4%	0%	0%	Analyte Avg. RPD
							3%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR MAY 2022
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2390071	0.02	0.02	0.02	0.02	0.02	0.10		
	2390072	0.02	0.02	0.02	0.02	0.02	0.10		
	2390073	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2390074	0.02	0.02	0.02	0.02	0.02	0.10		
	2390075	0.02	0.02	0.02	0.02	0.02	0.10		
	2390076	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-011354	2399518		0.02	0.02	0.08	0.18	0.02	0.11	
		2356422	0.02	0.02	0.07	0.17	0.02	0.12	
						8.60			Relative % Difference
1-531422	2399519		0.02	0.24	0.80	0.58	0.02	0.10	
		2359728	0.02	0.24	0.80	0.62	0.02	0.10	
				1.67	0.13	7.02			Relative % Difference
1-531404	2399520		0.05	1.25	0.03	0.95	0.02	0.10	
		2360694	0.04	1.27	0.02	0.97	0.02	0.10	
				1.59		1.66			Relative % Difference
1-011155	2399521		0.02	0.05	0.05	0.12	0.02	0.13	
		2359498	0.02	0.05	0.04	0.09	0.02	0.13	
						25.35			Relative % Difference
			0%	2%	0%	11%	0%	0%	Analyte Avg. RPD
							4%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
QA/QC ANALYSIS RESULTS FOR JUNE 2022
ORANGE COUNTY SANITATION DISTRICT

Equipment Blank Evaluation									
Equipment	Sample #	Cd	Cr	Cu	Ni	Pb	Zn		
		0.02	0.02	0.02	0.02	0.02	0.10	Reporting Limit (mg/L)	
Sampler A	2398569	0.02	0.02	0.02	0.02	0.02	0.10		
	2398570	0.02	0.02	0.02	0.02	0.02	0.10		
	2398571	0.02	0.02	0.02	0.02	0.02	0.10		
Sampler B	2398572	0.02	0.02	0.02	0.02	0.02	0.10		
	2398573	0.02	0.02	0.02	0.02	0.02	0.10		
	2398574	0.02	0.02	0.02	0.02	0.02	0.10		
		0.00	0.00	0.00	0.00	0.00	0.00	Avg. Deviation	
							0.00	Table Average Deviation	
Archive Sample Evaluation									
Permit #	Archive #	Original #	Cd	Cr	Cu	Ni	Pb	Zn	
1-521761	2399522		0.02	0.02	0.28	0.02	0.05	0.10	
		2363131	0.02	0.02	0.28	0.02	0.05	0.10	
					1.08				Relative % Difference
1-600708	2399523		0.02	0.03	0.37	0.41	0.02	0.22	
		2372009	0.02	0.03	0.34	0.41	0.02	0.23	
					9.90	0.48			Relative % Difference
1-521858	2366413		0.02	0.02	0.06	0.03	0.02	0.02	
		2404967	0.02	0.02	0.06	0.02	0.02	0.11	
									Relative % Difference
1-021185	2404968		0.02	0.03	0.09	0.02	0.02	0.02	
		2370568	0.02	0.02	0.09	0.06	0.02	0.02	
									Relative % Difference
			0%	0%	5%	0%	0%	0%	Analyte Avg. RPD
							3%	Table Average RPD	

Results and RLs reported in mg/L. Results at or below the Reporting Limits are shown as the RLs. Bold numbers are results greater than 5 times the RL. Italic bold numbers are greater than 20 times the RLs. Per Standard Methods, values where the average is below 5 times the RL are not used for the RPD calculation.

APPENDIX I
SAMPLE COLLECTION CHECK RESULTS, FY 2021/22
ORANGE COUNTY SANITATION DISTRICT

SAMPLE COLLECTION CHECK RESULTS, JUL-SEP 2021									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2336857	0.00	0.04	0.00	0.08	0.00	0.00	66.0	2336866
	2336858	0.00	0.04	0.00	0.07	0.00	0.00	45.0	2336867
	2336859	0.00	0.04	0.00	0.07	0.00	0.00	66.0	2336868
	2336861	0.00	0.04	0.00	0.07	0.00	0.00	61.0	2336869
	2336996	0.00	0.05	0.00	0.08	0.00	0.00	70.0	2336870
	Average Range	0.00	0.04	0.00	0.07	0.00	0.00	61.6	Average Range
	0.00	0.00	0.00	0.00	0.00	0.00	25.0		
Sampler Average Deviation		--	--	--	--	--	--	6.9	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2336860	0.00	0.04	0.00	0.08	0.00	0.00	52.0	2336871
	2336862	0.00	0.05	0.00	0.08	0.00	0.00	62.0	2336872
	2336863	0.00	0.05	0.00	0.08	0.00	0.00	66.0	2336873
	2336864	0.00	0.05	0.00	0.08	0.00	0.00	58.0	2336874
	2336865	0.00	0.05	0.00	0.08	0.00	0.10	68.0	2336875
	Average Range	0.00	0.05	0.00	0.08	0.00	0.02	61.2	Average Range
	0.00	0.00	0.00	0.00	0.00	0.10	16.0		
Sampler Average Deviation		--	--	--	--	--	--	5.0	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
		--	--	--	--	--	--	0.7	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.10	1.0	
SAMPLE COLLECTION CHECK RESULTS, OCT-DEC 2021									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2353243	0.00	0.00	0.02	0.00	0.00	0.11	8.0	2353252
	2353244	0.00	0.00	0.02	0.00	0.00	0.11	7.0	2353253
	2353245	0.00	0.00	0.03	0.00	0.00	0.11	6.5	2353254
	2353246	0.00	0.00	0.02	0.00	0.00	0.12	6.5	2353255
	2353251	0.00	0.00	0.02	0.00	0.00	0.13	8.0	2353077
	Average Range	0.00	0.00	0.02	0.00	0.00	0.11	7.2	Average Range
	0.00	0.00	0.00	0.00	0.00	0.02	1.5		
Sampler Average Deviation		--	--	--	--	--	--	0.6	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2353252	0.00	0.00	0.02	0.00	0.00	0.13	6.0	2353256
	2353253	0.00	0.00	0.02	0.00	0.00	0.13	5.5	2353257
	2353254	0.00	0.00	0.02	0.00	0.00	0.12	6.5	2353258
	2353255	0.00	0.00	0.02	0.00	0.00	0.13	5.5	2353259
	2353077	0.00	0.00	0.02	0.00	0.00	0.11	6.0	2353261
	Average Range	0.00	0.00	0.02	0.00	0.00	0.12	5.9	Average Range
	0.00	0.00	0.00	0.00	0.00	0.03	1.0		
Sampler Average Deviation		--	--	--	--	--	--	0.3	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
		--	--	--	--	--	--	19.8	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.10	1.0	

Bold numbers are greater than five times the RLs. Results and RLs are reported in mg/L.

APPENDIX I
SAMPLE COLLECTION CHECK RESULTS, FY 2021/22
ORANGE COUNTY SANITATION DISTRICT

SAMPLE COLLECTION CHECK RESULTS, JAN-MAR 2022									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2363311	0.00	0.04	0.02	0.04	0.00	0.30	78.0	2363302
	2363312	0.00	0.04	0.03	0.04	0.00	0.29	70.0	2363303
	2363313	0.00	0.04	0.02	0.04	0.00	0.27	63.0	2363304
	2363314	0.00	0.05	0.02	0.05	0.00	0.29	67.0	2363305
	2363315	0.00	0.04	0.03	0.04	0.00	0.27	63.0	2363306
	Average Range	0.00	0.04	0.02	0.04	0.00	0.28	68.2	Average Range
	0.00	0.01	0.00	0.01	0.00	0.02	15.0		
Sampler Average Deviation		--	--	--	--	--	--	4.6	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2363316	0.00	0.05	0.02	0.05	0.00	0.30	58.0	2363307
	2363317	0.00	0.04	0.03	0.04	0.00	0.28	65.0	2363308
	2363318	0.00	0.04	0.02	0.04	0.00	0.27	56.0	2363309
	2363319	0.00	0.04	0.02	0.04	0.00	0.27	62.0	2363310
	2367640	0.00	0.05	0.03	0.04	0.00	0.30	63.0	2367639
	Average Range	0.00	0.04	0.02	0.04	0.00	0.28	60.8	Average Range
	0.00	0.00	0.00	0.01	0.00	0.03	9.0		
Sampler Average Deviation		--	--	--	--	--	--	3.0	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
		--	--	--	--	--	--	11.5	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.10	1.0	
SAMPLE COLLECTION CHECK RESULTS, APR-JUN 2022									
Sampler A	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2397234	0.00	0.13	0.04	0.00	0.00	0.11	4.1	2397243
	2397235	0.00	0.13	0.05	0.00	0.00	0.12	4.1	2397244
	2397236	0.00	0.13	0.04	0.00	0.00	0.13	3.6	2397246
	2397237	0.00	0.14	0.05	0.00	0.02	0.13	3.6	2397247
	2397238	0.00	0.13	0.05	0.00	0.00	0.12	3.4	2397304
	Average Range	0.00	0.13	0.04	0.00	0.00	0.12	3.8	Average Range
	0.00	0.01	0.01	0.00	0.02	0.01	0.7		
Sampler Average Deviation		--	0.00	--	--	--	--	--	
Sampler B	Sample #	Cd	Cr	Cu	Ni	Pb	Zn	TSS	Sample #
	2397239	0.00	0.13	0.04	0.00	0.00	0.00	3.4	2397245
	2397240	0.00	0.13	0.04	0.00	0.00	0.00	3.2	2397248
	2397241	0.00	0.12	0.04	0.00	0.00	0.00	3.8	2397249
	2397242	0.00	0.13	0.04	0.00	0.00	0.00	3.2	2397250
	2397300	0.00	0.12	0.04	0.00	0.00	0.00	3.5	2397251
	Average Range	0.00	0.12	0.04	0.00	0.00	0.00	3.4	Average Range
	0.00	0.01	0.00	0.00	0.00	0.00	0.6		
Sampler Average Deviation		--	0.00	--	--	--	--	--	
Site Relative Percent Difference		Cd	Cr	Cu	Ni	Pb	Zn	TSS	
		--	6.07	--	--	--	--	--	
Reporting Limits		0.02	0.02	0.02	0.02	0.02	0.10	1.0	

Bold numbers are five times greater than the RLs. Results and RLs are reported in mg/L.

Appendix J. Permittees with Pretreatment Equipment

APPENDIX J
PERMITTEES WITH PRETREATMENT EQUIPMENT, FY 2021/22
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Facility Name	Permit No.	Regulation																											
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Alloy Die Casting, Co. dba ADC Aerospace	1-531437	464.16(a), 464.16(c), 464.16(h), 464.46(a), 464.46(b), 464.46(d)	X	X	.	.	X	X	X	.	.	.	X	X	.
Alloy Tech Electropolishing, Inc.	1-011036	433.17(a)	X	.	.	X	.	.	.	X	.	X
AlSCO, Inc.	1-021656	403.5(d)	X	X	X
Aluminum Forge - Div. of Alum. Precision	1-071035	467.46	X	.	.	.	X	X	X	X	.	.	X	X	.
Aluminum Precision Products, Inc. (Central)	1-011038	467.45	X	X	.
Aluminum Precision Products, Inc. (Susan)	1-011100	467.45, 467.46	X	.	.	X	X	X	.	X	X	.	.	X	.	.
Amerimax Building Products, Inc.	1-021102	465.35	X
Ameripecc, Inc.	1-031057	403.5(d)	X	X	X	.	.	.
Anaheim Extrusion Co., Inc.	1-021168	467.35(c)	X	.	.	X	X	X
Andres Technical Plating	1-521798	433.17(a)	X	.	X	.	.	X	.	.
AnoChem Coatings	1-600295	433.17(a)	X	.	.	X
Anodyne, Inc.	1-511389	433.17(a)	.	.	X	X	X	X	.	.	X	.	.	X	X	.	.	X	.	X
Anomil Ent. Dba Danco Metal Surfacing	1-011155	433.17(a)	.	.	X	.	X	X	.	.	X	X	X	.	.	X	.	.

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 ORANGE COUNTY SANITATION DISTRICT**

Facility Name	Permit No.	Regulation																														
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank			
APCT Anaheim	1-600689	433.17(a)	•	•	•	•	X	•	X	X	X	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
APCT Orange County	1-600503	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•
ARO Service	1-021192	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Arrowhead Operating Inc.	1-601062	403.5(d)	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•

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Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
			Arrowhead Products Corporation	1-031137	420.76, 420.96(c)(5), 471.35(a), 471.35(bb), 471.35(dd), 471.35(ff), 471.35(j), 471.35(l), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.65(a), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(s), 471.65(w), 471.65(x)	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•
Astech Engineered Products (1)	1-571295	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•

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Facility Name	Permit No.	Regulation																											
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Astech Engineered Products (2)	1-601719	433.17(a)	X	X	.	X	.	.	.	
Auto-Chlor System of Washington, Inc.	1-511384	417.166	X	
Aviation Equipment Processing	1-071037	433.17(a)	X	.	X	X	.	.	X	.	X	X	X	.
Avid Bioservices, Inc.	1-571332	439.17, 439.27	X	
B. Braun Medical Inc - Alton Pkwy Construction	S-601408	403.5(d)	X	
B. Braun Medical, Inc. (West/Lake)	1-541183	439.47, 463.16, 463.26, 463.36	X	
Basic Electronics, Inc.	1-031094	433.17(a)	X	.	X	X	.	.	X	X	.	.
BAZZ HOUSTON CO .	1-031010	403.5(d)	X
Beckman Coulter, Inc.	1-521824	433.17(a)	X
Beo-Mag Plating	1-511370	433.17(a)	X	.	.	.	X	X	.	.	.	X	.	X	.	.	X	.	.	.
Beverage Visions LLC (Anaheim)	1-601448	403.5(d)	X
Bimbo Bakeries U.S.A, Inc.	1-521838	403.5(d)	X
Black Oxide Industries, Inc.	1-021213	433.17(a)	X	.	.	.	X	X	.	.	.	X	.	X	.	.	X	.	X	.
Blue Lake Energy	1-521785	403.5(d)	X	X	X	.
Blue Ribbon Container and Display, Inc.	1-601468	403.5(d)	X	.	X	X	X	.	.

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Facility Name	Permit No.	Regulation																												
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
Bodycote Thermal Processing	1-031120	403.5(d)	X
Boeing Company (Graham)	1-111018	433.17(a)	.	.	X	X	X	.	.
Brasstech, Inc	1-600316	433.17(a)	X
Brea Power II, LLC	1-521837	403.5(d)	X
Bridge Energy, LLC	1-600398	403.5(d)	X
Bridgemark Corporation	1-521844	403.5(d)	X	X	X
Brindle/Thomas - Bradley	1-531428	403.5(d)	X
Brindle/Thomas - Brooks & Kohlbusch	1-531429	403.5(d)	X	X
Brindle/Thomas - Catalina & Copeland	1-531430	403.5(d)	X	X
Brindle/Thomas - Dabney & Patton	1-531427	403.5(d)	X	X

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Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
Bristol Industries	1-021226	433.17(a), 467.36(c), 471.35(dd), 471.35(ee), 471.35(ff), 471.35(i), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	X	•	•	•	•	•	X	•	•	X	X	X	
Brookfield SoCal Land Constructors LLC	S-601020	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Brookfield SoCal Land Constructors LLC	S-601492	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
Brothers International Desserts (North)	1-600583	405.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	
Brothers International Desserts (West)	1-600582	405.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	
Burlington Engineering, Inc.	1-521770	433.17(a)	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	X	•	•	•	X	•	•	•	•	•	X	•	•
Cadillac Plating, Inc.	1-021062	433.17(a)	•	•	•	•	X	X	•	•	X	•	•	•	•	•	•	•	X	•	X	•	•	X	•	•	X	•	•	•
Cal-Aurum Industries, Inc.	1-111089	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	X	•	X	•	•	X	•	•	•	•	•	•	•	•	X	X	•

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Facility Name	Permit No.	Regulation																											
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Continuous Coating Corporation	1-021290	433.17(a), 465.15	X	.	.	.	X	X	.	.	.	X	.	X	X	X	.	.	X	.	X
Corru-Kraft Buena Park	1-600806	403.5(d)	X
Corru-Kraft Fullerton	1-601450	403.5(d)	X	X	.	.
Corru-Kraft Fullerton	2-022319	403.5(d)	X	X	.	.
CP-Carrillo, Inc. (Armstrong)	1-600920	433.17(a)	X
Crest Coating, Inc.	1-021289	433.17(a)	X	.	.	.	X	X	X	X	X	.	.
Custom Enamelers, Inc.	1-021297	433.17(a)	X
CVS Health	S-601582	403.5(d)	X
Cytec Engineered Materials, Inc.	Z-600005	433.17(a)	X	X	X	X
D.F. Stauffer Biscuit Co., Inc.	1-600414	403.5(d)	X
Dae Shin USA, Inc.	1-031102	410.56	X
DAH Oil, LLC	1-581173	403.5(d)	X
Darling Ingredients, Inc.	1-511378	403.5(d)	X	X	.	X	.	X	.	X	.	X	.	.	X
Data Aire, Inc. #2	1-021379	433.17(a)	X	X	X
Data Electronic Services, Inc.	1-011142	433.17(a)	.	.	X	.	X	.	.	.	X	X	.	.	X	.	X
Data Solder, Inc.	1-521761	433.17(a)	X	.	.	.	X	X	X	X	.	.	X	.	.
Dayton Flavors, Inc.	1-600038	403.5(d)	X
DCOR, LLC	1-111013	403.5(d)	X	.	.	.	X	X
Diamond Environmental Services, LP	1-600244	403.5(d)	X

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Facility Name	Permit No.	Regulation																											
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
DLA Installation Management for Energy (DM-FEE)	S-600944	403.5(d)	X
DNR Industries, Inc.	Z-601019	433.17(a)	X
Dr. Smoothie Enterprises - DBA Bevolution Group	1-600131	403.5(d)	X	.	X	.	.	.
DRS Network & Imaging Systems, LLC	1-531405	469.18(a)	X	X	X	.	.	.
Ducommun Aerostructures, Inc.	1-021105	433.17(a)	X	.	.	X	X	X	X	.	X	.	X	.
Dunham Metal Plating Inc.	1-601023	433.17(a)	X	X	.	X	X	X	.	.	.	X	.	.	X	.	.	X	.	X
Dunham Metal Processing	1-021325	433.17(a)	X	X	.	.	X	X	X	X	.	.	X	.	.	.
E&B Natural Resources- Angus Petroleum Corporation	1-600254	403.5(d)	X	X
Earth Friendly Products	1-600739	417.166, 417.86	X
EFT Fast Quality Service, Inc.	1-011064	433.17(a)	X	.	X	.	X	X	.	.	X	X	.	.	.	X	.	.
Electro Metal Finishing Corporation	1-021158	433.17(a)	X	X
Electrode Technologies, Inc. dba Reid Metal Finishing	1-511376	433.17(a)	X	X	.	.	X	.	.	X	X	X	.	X	X	.	.	X	.	X	.
Electrolurgy, Inc.	1-071162	433.17(a)	.	.	X	.	.	X	.	.	X	.	.	X	X	.	.	.	X	.	X	.	.	X	.	.	X	.	.
Electron Plating Inc.	1-021336	433.17(a)	X	X	.	.	X	X	X	X	.	.	X	.	X	X
Electronic Precision Specialties, Inc.	1-021337	433.17(a)	X	.	X	X	X	X

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Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Embee Processing (Anodize)	1-600456	413.14(c), 413.54(c), 413.64(c), 433.17(a)	•	•	•	•	•	•	X	•	•	•	•	X	X	•	•	•	•	•	•	X	•	•	X	•	•	•	•
Embee Processing (Plate)	1-600457	413.14(c), 413.54(c), 413.64(c), 413.74(c), 433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•
Emerald SoCal, LLC / Emerald Orange	1-601615	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	
Excello Circuits, Inc. (Hunter)	1-601356	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	
Expo Dyeing and Finishing, Inc.	1-031322	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	X	•	•	•	•	
Fabrication Concepts Corporation	1-011068	433.17(a)	•	•	•	•	•	•	•	X	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	
Fineline Circuits & Technology, Inc.	1-021121	433.17(a)	•	•	X	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	•	•	•	X	•	•	X	•	

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Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
FMH Aerospace Corp.	1-600585	433.17(a), 467.16, 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(w)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	X	•	•	•	•	•	
G & M Oil Company, Inc. - Station #50	S-053293	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	
Gallade Chemical, Inc.	1-011257	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	•	•	•	X	•	•	•	
Gallade Chemical, Inc.	S-051243	403.5(d)	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	
Gemini Industries, Inc.	1-071172	415.26, 421.266(b), 421.266(e), 421.266(i), 421.266(j), 421.266(m), 421.266(n)	•	•	•	•	X	•	•	X	•	•	•	•	•	•	•	•	X	X	X	•	•	•	•	•	•	X	X	•
Gemtech Coatings	Z-600544	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	
GKN Aerospace Transparency Systems	1-531401	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	

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Facility Name	Permit No.	Regulation	Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank
Gold Coast Baking Company, Inc.	1-601700	403.5(d)	X	X	X
Graphic Packaging International, Inc.	1-571314	403.5(d)	X
Guadalajara Tires Services	S-600976	403.5(d)	.	X	X	X	X
Harbor Truck Bodies, Inc.	1-021286	433.17(a)	X	.	.	X	X	X	X	.	.	X	.	.
Harry's Dye & Wash, Inc.	1-521746	403.5(d)	X	X
Hartwell Corporation	1-021381	403.5(d)	X
Hellman Properties, LLC	1-600273	403.5(d)	X
Hi Tech Solder	1-521790	433.17(a)	X	.	.	.	X	X	X	X	.	.
Hightower Plating & Manufacturing Co.	1-021185	433.17(a)	X	.	X	.	X	X	.	.	X	.	.	X	X	.	.	X	X	X	.	.	X	.	X
Hixson Metal Finishing	1-061115	433.17(a)	.	.	.	X	X	X	.	.	X	X	.	X	X	X	.	X	X	.	.	X	.	.
House Foods America Corporation (East)	1-600906	403.5(d)	X
Howmet Aerospace	S-000790	403.5(d)	X

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			Howmet Global Fastening Systems Inc.	1-021081	433.15(a), 433.17(a), 467.46, 471.65(j), 471.65(m), 471.65(n), 471.65(o), 471.65(p), 471.65(q), 471.65(r), 471.65(w), 471.65(x)	•	•	•	•	X	X	•	•	X	•	•	X	X	•	•	X	X	X	X	•	X	X	X	•
Hyatt Die Cast & Engineering Corporation	Z-331236	464.16(a), 464.16(c), 464.16(h), 464.46(b), 464.46(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•
Ideal Anodizing, Inc.	1-021041	433.17(a)	•	•	•	•	X	X	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	X	•
Ikon Powder Coating, Inc.	1-521756	433.17(a)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•
Image Technology, Inc.	1-521755	417.86	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	X	•	•	•	X	•
Independent Forge Company	Z-601008	467.45	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	X	•	X	•	•	X	•	•
Industrial Metal Finishing, Inc.	1-521828	403.5(d)	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	X	•

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Intec Products, Inc.	1-021399	410.36, 410.46	X	X	.	.	.
Integral Aerospace, LLC	1-600243	433.17(a)	X	X	.	X	X	X	.
International Paper Company (Anaheim)	1-521820	403.5(d)	X	.	X	X	X	.	.
International Paper Company (Buena Park Bag)	1-531419	403.5(d)	X	.	X	X	.	.
International Paper Company (Buena Park Container)	1-031171	403.5(d)	X	.	X	X	X	.	.	X	.	.	.
Irvine Company Retail Properties	S-054311	403.5(d)	.	X
IsoTis OrthoBiologics, Inc.	1-601134	403.5(d)	X	.	.	.
ITT, LLC	S-051349	403.5(d)	.	X	X	X
J & R Metal Finishing Co.	1-521823	403.5(d)	X	X	X	.	.	X	.	.	X	.	.	.
J and J Operators LLC	1-601614	403.5(d)	X
J&J Marine Acquisition Co., LLC	1-551152	403.5(d)	.	X	X	X	X	.	.	X	X	.	X	.	X	.
JD Processing, Inc. (East)	1-511407	433.17(a)	X	.	X	X	X	.	X	X	.	.	.
JD Processing, Inc. (West)	1-600978	433.17(a)	X	.	.	X	X	X	.	.	X	X	X	.	X	X
Jellco Container, Inc.	1-021402	403.5(d)	X
JOHN A. THOMAS - BOLSA OIL	1-031065	403.5(d)	X	X	X
Kinsbursky Brothers Supply, Inc.	1-021424	403.5(d)	X	.	.	X	.	X	.	.	X	.	X	.	X	.	X

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Kirkhill, Inc. (North)	1-600608	428.76(a)	X	
Kirkhill, Inc. (South)	1-600609	428.76(a)	X	
Kraft Heinz Company	1-071056	403.5(d)	X	X	X	.	.	.	
Kryler Corporation	1-021428	433.17(a), 433.17(b)	X	
La Habra Bakery	1-031029	403.5(d)	X	
Lennar Homes of California, Inc. (15 & 75 Rockefeller)	S- 601114	403.5(d)	X	
Lightning Diversion Systems LLC	1-600338	433.17(a)	X	X	X	.	.	
Linco Industries, Inc.	1-021253	433.17(a)	X	X	X	X	.	.	X	.	.	
LM Chrome Corporation	1-511361	433.17(a)	X	X	.	.	X	.	.	X	.	.	X	.	.	X	.	X	.	X	.	.	X	.	X	
Logi Graphics, Inc.	1-031049	433.17(a)	X	.	X	X	X	.	.	X	X	.	X	
M.S. Bellows	1-111007	433.17(a)	X	
Magnetic Metals Corporation	1-531391	433.17(a)	X	X	
Manufactured Packaging Products	1-521793	403.5(d)	X	
Manufactured Packaging Products (MPP Fullerton)	1-021681	403.5(d)	X	X	X	.	X	.	.	.	X	.	X	.	.	.	
Markland Manufacturing, Inc.	1-011046	433.17(a)	X	X	X	.	.	X	.	X	X	X	.	X	X	.	X	X	.	.
Maruchan, Inc. (Deere)	1-071024	403.5(d)	X	X	.	.	.
Maruchan, Inc. (Deere-South)	1-601021	403.5(d)	X	X	.	.	.
Maruchan, Inc. (Laguna Cyn)	1-141015	403.5(d)	X	X	.	X	.	.	.
Marukome USA, Inc.	1-141023	403.5(d)	X

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Omni Metal Finishing, Inc. (Building 4)	1-600981	433.17(a)	X
Only Cremations for Pets (Newport Beach)	1-601084	403.5(d)	X
Orange County Water District GWSFE Project Plant 2	S-601168	403.5(d)	X
Orange County Water District GWSFE Project Plant 1	S-601169	403.5(d)	X
Ortronics, Inc.	Z-601203	433.17(a)	X
Pacific Image Technology, Inc.	1-021070	433.17(a)	X	.	X
Pacific Western Container	1-511371	403.5(d)	X	X	.	.	.	X	.	.	X	X
Parker Hannifin Corporation	Z-600979	433.17(a)	X	.	X
Patriot Wastewater, LLC (Freedom CWT)	1-521861	437.47(b)	X	X	.	.	X	.	X	.	X	.	X	X
Patriot Wastewater, LLC (Freedom Non-CWT)	1-600147	403.5(d)	X	X	X
PCX Aerosystems - Santa Ana	1-601618	433.17(a)	X
Performance Powder, Inc.	1-521805	433.17(a)	X
Petroprize Corporation	1-581180	403.5(d)	X
Phillips 66 Company (La Habra)	S-601225	403.5(d)	.	X

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Phillips 66 Company (Santa Ana)	S-600946	403.5(d)	.	X	X
Pier Oil Company, Inc.	1-581178	403.5(d)	X	X	
Pioneer Circuits, Inc.	1-011262	433.17(a)	X	.	X	.	.	.	X	X	.	X	X	.	X	X	.	X
Platinum Surface Coating, Inc.	1-521852	433.17(a)	X	.	X	X	X	.	.
Plegel Oil Company (Blattner/Joe Johnson)	1-521864	403.5(d)	X	X	
Plegel Oil Company - (A.H.A.)	1-021176	403.5(d)	X	
Powdercoat Professionals Inc.	Z-600275	433.17(a)	X	
Power Distribution, Inc.	1-511400	403.5(d)	X	
Powerdrive Oil & Gas Company, LLC (2nd)	1-600248	403.5(d)	X	
Precious Metals Plating Co., Inc.	1-011265	433.17(a)	X	.	X	X	X	X	
Precision Anodizing & Plating, Inc.	1-521809	433.17(a)	X	X	.	X	X	.	.	X	.	.	
Precision Circuits West, Inc.	1-011008	433.17(a)	X	.	.	X	X	X	.	.	X	X	.	X	
Precision Resource, California Division	1-111002	403.5(d)	X	X	
Precon, Inc.	1-021581	403.5(d)	X	X	X	
Prima-Tex Industries Inc.	1-031036	403.5(d)	X	X	.	.	.	
Prudential Overall Supply	1-071235	403.5(d)	X	
Pulmuone Foods USA, Inc. (East)	1-601443	403.5(d)	X	.	X	.	.	.	
Pulmuone Foods USA, Inc. (West)	1-531397	403.5(d)	X	.	X	.	.	.	

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Quality Aluminum Forge, LLC (Cypress North)	1-521833	467.45	X	.	.	X	X	X	X	.	.	.	X	.	.	
Quality Aluminum Forge, LLC (Cypress South)	1-600272	467.46	X	X	.	.	X	X	.	.	
RBC Transport Dynamics Corp.	1-011013	433.17(a)	X	.	.	.	X	.	.	.	X	X	X	X	.	.	.		
Republic Waste Services	1-521827	403.5(d)	X	
Republic Waste Services of So. Cal., LLC	1-021169	403.5(d)	X	
Rich Products Corporation (North)	1-601022	403.5(d)	X	X	
Rich Products Corporation (South)	1-511404	403.5(d)	X	X	
Rigiflex Technology, Inc.	1-021187	433.17(a)	X	.	X	X	X	.	.	.	
Robinson Pharma, Inc. (Harbor South)	1-511412	439.47	X	
Rolls-Royce HTC	1-600212	403.5(d)	X	.	.	
Rolls-Royce HTC (fume scrubber)	1-600213	403.5(d)	X	
Rountree / Wright Enterprises, LLC	1-111028	403.5(d)	X	X	X	
S & C Oil Co., Inc. (1)	1-581175	403.5(d)	X	X	
S & C Oil Company, Inc. (2)	1-601637	403.5(d)	X	X	
Sabic Innovative Plastics, US, LLC	S-057284	403.5(d)	X	X	X	.
Safety-Kleen Systems, Inc.	1-600690	403.5(d)	X	X	X	

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South Coast Circuits, Inc. (Bldg 3506 Ste A)	1-601446	433.17(a)	•	•	•	•	X	•	•	•	X	X	•	•	•	•	•	X	X	•	•	•	•	•	•	•	X	X	•	•
South Coast Circuits, Inc. (Bldg 3512 A)	1-511365	433.17(a)	•	X	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	X	•	•	•	X	•	•	•	X	•	•
South Coast Circuits, Inc. (Bldg 3512 Ste A)	1-601445	433.17(a)	•	X	•	•	•	•	•	•	•	•	•	•	•	X	•	•	X	X	•	•	•	X	•	•	•	X	•	•
South Coast Circuits, Inc. (Bldg 3524 A)	1-011054	433.17(a)	•	•	•	•	•	•	•	•	X	X	•	•	•	•	•	X	•	•	X	•	•	•	•	•	X	X	•	•
South Coast Circuits, Inc. (Bldg 3524 Ste A)	1-601447	433.17(a)	•	•	•	•	•	•	•	•	X	X	•	•	•	•	•	X	•	•	X	•	•	•	•	•	X	X	•	•
South Coast Water	1-511405	403.5(d)	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Southern California Edison #1 (Mt)	1-031014	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	X	•	•	•	•	•	•
Southern California Edison #2 (Das)	1-031015	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•
Southern California Edison #3 (Lars)	1-031016	403.5(d)	•	•	•	•	•	•	•	X	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•	•

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			SPS Technologies LLC, DBA Cherry Aerospace	1-511381	433.17(a), 467.46, 467.66, 471.35(ee), 471.35(f), 471.35(ff), 471.35(j), 471.35(l), 471.35(m), 471.35(r), 471.35(s), 471.35(t), 471.35(u), 471.35(v), 471.35(w), 471.65(g), 471.65(i), 471.65(j), 471.65(m), 471.65(n), 471.65(p), 471.65(q), 471.65(r), 471.65(s), 471.65(x)	•	•	X	•	X	X	•	•	X	•	•	X	X	•	•	X	•	•	•	•	•	X	•	•

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Stainless Micro-Polish, Inc.	1-021672	433.17(a)	X	.	.	.	X	X	X	.	.	.	X	.	X
Star Manufacturing LLC, dba Commercial Metal Forming	1-600653	403.5(d)	X	
Star Powder Coating, Inc.	1-531425	433.17(a)	X	X	.	.	
Statek Corporation (Main)	1-021664	433.17(a), 469.26(a)	X	X	
Statek Corporation (Orange Grove)	1-521777	469.28(a)	X	X	
Stepan Company	1-021674	417.106, 417.146, 417.166	X	.	.	X	X	
Stremicks Heritage Foods, LLC	1-021028	405.16, 405.26, 405.76	X	X	
Summit Interconnect, Inc.	1-600012	433.17(a)	X	X	X	.	.	X	X	.	.	
Summit Interconnect, Inc., Orange Division	1-600060	433.17(a)	.	.	X	.	.	X	X	X	X	X	X	
Superior Plating	1-021090	433.17(a)	X	.	.	.	X	.	.	X	X	.	.	X	.	.	X	X	.	.	
SUPERIOR PROCESSING (1)	1-021403	433.17(a)	.	.	X	X	.	X	.	X	X		
Superior Processing (2)	1-601701	433.17(a)	.	.	X	X	.	X	.	X	X		
T.A.C. West, Inc.	1-601678	403.5(d)	X	
T.A.C. West, Inc.	2-022088	403.5(d)	X	
Tayco Engineering, Inc.	1-031012	433.17(a)	X	.	X	X	X	.	

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Taylor-Dunn Manufacturing Company	1-021123	433.17(a)	X
Taylor-Dunn Manufacturing, LLC (waev)	1-601699	433.17(a)	X
Terra Universal, Inc.	1-601407	433.17(a)	X	X
Thermal-Vac Technology, Inc.	1-021282	433.17(a)	.	.	X	X	.	X	X	X
Thompson Energy Resources, LLC (Brea)	1-601469	403.5(d)	X
Thrifty Oil Company #150	S-000197	403.5(d)	.	X	X	.	.	.	X	.	X
Timken Bearing Inspection, Inc.	1-531415	433.17(a)	X	X
Tiodize Company, Inc.	1-111132	433.17(a)	X	X	.	X	X	.	X	X	.	.	X	.	X
Toyota Racing Development	1-071059	403.5(d)	.	X	.	.	X	X	.	X
Transline Technology, Inc.	1-021202	433.17(a)	.	.	X	.	X	X	.	X	X	X	.	.
Tropitone Furniture Co., Inc.	1-141163	433.17(a)	X
TTM Technologies North America, LLC. (Coronado)	1-521859	433.17(a)	X	X	.	.	X	X	.	.	X
TTM Technologies North America, LLC. (Croddy)	1-511366	433.17(a)	X	.	.	.	X	X	.	.	.	X	.	X	.	.	X	.	X
TTM Technologies North America, LLC. (Harbor)	1-511359	433.17(a)	X	X	X	.	X	X	.	X

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ORANGE COUNTY SANITATION DISTRICT

Facility Name	Permit No.	Regulation																												
			Anion Exchange	Carbon Filtration	Cation Exchange	Chelate Breaking Tank	Chemical Precipitation	Chromium Reduction	Clarification	Clarification eop	Clarification neop	Coagulation/Flocculation	Cross Flow Filter	Cyanide Destruct 1Stage	Cyanide Destruct 2Stage	Effluent pH Adjustment	Electrowinning/Plate-out	Equalization Tank	Holding Tank	Mixed Bed Ion Exchange	Multi-Purpose Tank 1	Multi-Purpose Tank 2	Oil/Water Separation	Other	Other Pressure Filtration Device	pH Adjust Tank-No Heavy Metals	Plate & Frame Filter Press	Polishing Filter	Sludge Thickening Tank	
U.S. Department of the Navy BRAC PMO West (North)	S-057256	403.5(d)	.	X
United Pharma, LLC	1-531418	403.5(d)	X	
Universal Molding Co.	1-521836	433.17(a)	X	X	.	X	X	X	X	.	.	
Van Law Food Products, Inc.	1-600810	403.5(d)	X	
Vi-Cal Metals, Inc.	1-521846	403.5(d)	X	
Warner Avenue Group, LLC.	S-601116	403.5(d)	.	X	X	X	
Waste Management Collections & Recycling, Inc. DBA Sunset Environmental	1-601581	403.5(d)	X	
Weber Precision Graphics	1-011354	403.5(d)	.	X	X	
Wells Fargo Bank, N.A. Corporate Properties Group	S-601357	403.5(d)	.	X	X	
West Newport Oil Company	1-061110	403.5(d)	X	
Wilco-Placentia Oil Operator, LLC	1-521829	403.5(d)	X	X	
Winonics (Brea)	1-031035	433.17(a)	X	.	.	X	X	.	.	.	X	.	X	.	X	.	X	.	X	
Winonics, Inc.	1-021735	433.17(a)	X	.	.	X	X	X	.	.	.	X	X	X	.	.		
Yakult USA, Inc.	1-521850	403.5(d)	X	



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